INGLEWOOD HIGH SCHOOL RECONSTRUCTION PROJECT

Draft Environmental Impact Report
State Clearinghouse No. 2025070682

Prepared for
Inglewood Unified School District

December 2025

ESA

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Acronyms and Other Abbreviations

Abbreviation	Definition
AB	Assembly Bill
ACBM	asbestos-containing building materials
ADA	Americans Disabilities Act
AIA	Airport Influence Area
ALUCP	Airport Land Use Compatibility Plan
ANSI	American National Standard Institute
APN	Assessor Parcel Numbers
AQMP	Air Quality Management Plan
ASF	Age Sensitivity Factors
ATCM	Airborne Toxic Control Measure
BACT	Best Available Control Technology
BMP	best management practices
BUG	Backlight, Uplight, and Glare
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEPA	California Environmental Protection Agency
CALGREEN	California Green Building Standards Code
CALINE4	California LINE Source Dispersion Model, version 4
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
C-C	Civic Center
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDF	character-defining features
CDOF	California Department of Finance
CEC	California Energy Commission
CEC-A15	CEC, California Retail Fuel Outlet Annual Reporting
CEQA	California Environmental Quality Act
CFC	California Fire Code
CNRA	California Natural Resources Agency

Abbreviation	Definition
CO	Carbon Monoxide
CPUC	California Public Utilities Commission
CTE	Career and Technical Education
CVC	California Vehicle Code
dBA	A-weighted decibels
DPM	diesel particulate matter
DSA	Division of State Architects
DTSC	Department of Toxic Substances Control
EDC	Education Code
EDFZ	Electricity Demand Forecast Zone
EIR	Environmental Impact Report
EMFAC	EMission FACtor model
ERC	Emission Reduction Credits
ESA	Environmental Science Associates
EV	electric vehicle
FCEV	fuel cell electric vehicles
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FRP	fiber-reinforced polymer
FTA	Federal Transit Administration
GHG	Greenhouse Gas
H2S	Hydrogen Sulfide
HABS	Historic American Building Survey
HQTA	High-Quality Transit Areas
HRA	Health Risk Assessment
IPCC	Intergovernmental Panel on Climate Change
ITE	Institute of Transportation Engineers
LACFD	Los Angeles County Fire Department
LAX	Los Angeles International Airport
LBP	old lead-based paint
LCI	Land Use and Climate Innovation
LID	low-impact development
LLG	Linscott, Law, and Greenspan
LOS	level of service
LUST	leaking underground storage tank

Abbreviation	Definition
LZ	lighting zones
MBTA	Migratory Bird Treaty Act
MLO	Model Lighting Ordinance
MPO	Metropolitan Planning Organization
MPR	Multipurpose Room
MRZ	Mineral Resource Zone
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NC	Noise Criteria
NFPA	National Fire Protection Association
NHTSA	National Highway Traffic Safety Administration
NMA	Neighborhood Mobility Areas
NO2	Nitrogen Dioxide
NOA	Notice of Availability
NOC	Notice of Completion
NOP	Notice of Preparation
NOx	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NSR	New Source Review
OEHHA	Office of Environmental Health Hazard Assessment
OFFROAD	off-road emissions factor
OPR	Office of Planning and Research
PCB	polychlorinated biphenyls
PGA	Priority Growth Areas
PM	Particulate Matter
PRC	Public Resources Code
PVC	polyvinyl chloride
RCNM	Roadway Construction Noise Model
RHNA	Regional Housing Needs Assessment
RPS	Renewable Portfolio Standards
RTP	Regional Transportation Plan
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	Southern California Air Quality Management District

Abbreviation	Definition
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SIP	State Implementation Plan
SLF	Sacred Lands File
SLM	Sound Level Meters
SO2	Sulfur Dioxide
SO42	State-identified criteria pollutants, including sulfates
SOX	Sulfur oxides
SRA	Source Receptor Area
SVP	Society of Vertebrate Paleontology
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminants
TDM	Transportation Demand Management
TeNS	Technical Noise Supplement
TIA	Transportation Impact Analysis
TNM	Traffic Noise Model
TOD	Transit-oriented developments
TPA	Transit Priority Areas
USEPA	U.S. Environmental Protection Agency
VdB	Decibel notation
VMT	Vehicle Miles Traveled
VOC	volatile organic compounds

EXECUTIVE SUMMARY

This Draft Environmental Impact Report (Draft EIR) has been prepared pursuant to the requirements of the California Environmental Quality Act (CEQA, Public Resources Code [PRC] Sections 21000 et. seq.) in accordance with CEQA Guidelines Section 15123. Accordingly, this chapter of the Draft EIR includes (1) a brief description of the Project; (2) issues raised during the Notice of Preparation (NOP) process, including areas of controversy known to the lead agency; (3) identification of potentially significant impacts and proposed mitigation measures or alternatives that would reduce or avoid those impacts; and (4) issues to be resolved, including the choice among alternatives and whether and how to mitigate the potential significant impacts.

ES.1 Project Description

This Draft EIR has been prepared for the Inglewood High School Reconstruction Project (Project). The Inglewood Unified School District (District), as the lead agency under CEQA, proposes to demolish the existing Administration Building, Music Building, Performing Arts Building, and numerous existing (temporary and permanent) classroom buildings of the Inglewood High School campus (Project Site). In addition, the existing Auditorium and Gymnasium would be internally renovated. Six new buildings would be constructed, including a two-story Administration and General Classroom building; a one-story Food Services and Multi-Purpose Room building; a one- to two-story Science Labs and General Classrooms building; a one-story Student Life building; a two-story Career and Technical Education building; and a one-story CTE and Music classrooms building. Recreational components include the demolition and reconstruction of the basketball and tennis courts, installation of a combination softball/football/soccer artificial turf field at the western edge of campus, and installation of lights to illuminate the courts and fields. The Project would remove existing asphalt areas, and landscaping improvements would be included throughout the Inglewood High School campus.

ES.1 Issues Raised during Notice of Preparation Process and Areas of Controversy

The following lists potential environmental issues or concerns raised in response to the NOP circulation, the comment period for which extended from July 16, 2025, through August 14, 2025. The NOP comments are contained in Appendix A-3 of this Draft EIR.

- Concerns regarding transportation (Refer to Chapter 3, *Project Description*, Section 4.8, *Transportation*, of this Draft EIR.)
- Concerns regarding biological resources (Refer to Section 5.6, *Impacts Found Not to be Significant*, and Appendix A-2 of this Draft EIR.)

- Concerns regarding hazards and hazardous materials (Refer to Section 5.6, *Impacts Found Not to be Significant*, and Appendix A-2 of this Draft EIR.)
- Concerns regarding tribal cultural resources (Refer to Section 4.9, *Tribal Cultural Resources,* of this Draft EIR.)

ES.2 Significant and Unavoidable Environmental Impacts

CEQA Guidelines Section 15126.2(a) requires that an EIR describe significant environmental impacts of a project on the environment. Direct and indirect significant effects shall be clearly identified and described, giving due consideration to short-term and long-term effects. As evaluated in Section 4.3, *Cultural Resources*, of this Draft EIR, and summarized below, implementation of the Project would result in significant impacts that cannot be mitigated with respect to impacts to Historic Resources.

Implementation of Mitigation Measures HIST-1 through HIST-4 would reduce the Project's impacts to historic resources, to the extent feasible. With implementation of Mitigation Measures HIST-1 through HIST-4, impacts to historic resources will be reduced through conducting a HABS-like survey to document the eligible historic buildings, providing an interpretive exhibit showcasing the history of the school, creation of a book that documents the eligible historic buildings and the history of the campus, and creating a salvage plan to retain important pieces of the school history. Since these mitigation measures capture the historical record of the resources, provide public access to that history, and preserve architectural elements, Mitigation Measures HIST-1 through HIST-4 would reduce the severity of the loss of the physical structures. Even with implementation of Mitigation Measures HIST-1 through HIST-4, the demolition of multiple eligible historic buildings would occur, and therefore, impacts would remain significant and unavoidable.

ES.3 Alternatives that Would Reduce or Avoid Significant Impacts

CEQA requires that an EIR describe a range of reasonable alternatives to the Project, or to the location of the Project, which could feasibly avoid or lessen any significant environmental impacts while substantially attaining the basic objectives of the Project. An EIR should also evaluate the comparative merits of the alternatives. The range of feasible alternatives is selected and discussed in a manner to foster meaningful public participation and informed decision-making.

ES.3.1 Alternative 1: No Project Alternative

CEQA Guidelines Section 15126.6 [e] requires an analysis of a No Project Alternative. The purpose of this alternative is to describe and analyze a scenario under which the Project is not implemented so that decision makers can compare the impacts of approving the Project with the impacts of not approving the Project. The No Project Alternative analysis must discuss the existing site conditions as well as what would reasonably be expected to occur in the foreseeable future based on any current plans, and it must be consistent with available infrastructure and community services.

Under the No Project Alternative, the Project Site would not be developed with the proposed improvements, and the existing facilities would remain. Use of the existing facilities, as they are

currently, would also remain the same, with no demolition of existing buildings, no construction of new buildings or sports facilities, and no new lighting installed. Students would continue to use the aging facilities, some of which are not code compliant.

ES.3.2 Alternative 2: Full Preservation

Alternative 2 proposes full preservation of the four potentially eligible historic structures (Building A, Building I, Building L, and Building M) rather than demolishing them and replacing them with new buildings. Buildings A, Building I, and Building M were determined to be individually eligible as a historical resource under the National Register at the local level and the California Register under criteria A/1 and C/3. Additionally, Buildings M and L were determined to be contributors to a historic district, eligible under the National Register at the local level and the California Register. As such, these four buildings are considered historical resources according to CEQA. The buildings that are not eligible historic structures would be demolished under this alternative, and new buildings would be constructed in their place to modernize the existing campus. The purpose of this alternative is to preserve the campus buildings that are considered eligible historic structures, thus eliminating the significant unavoidable impact to historic resources, while also attempting to meet at least a portion of the Project objectives.

Due to Building A's current proximity to an active fault line, several retrofits would be required to bring the building up to both Building Code and Educational Code standards. Under the Project, the new replacement Building A is sited more than 50 feet from the active fault (as required by State law), thereby eliminating the seismic hazard associated with surface fault rupture. The upgrades required to make Building A fully accessible would include an elevator, which may affect the building's structural integrity, as well as multiple lifts and ramps that may be difficult to add within the dimensions of the existing hallways and corridors. In addition, due to the acoustic improvements required for Building I to meet existing Educational Code standards, structural improvements would also be necessary. Due to the significant costs associated with renovating all eligible historic structures, Buildings M and L would be retained in place until funding becomes available for modernization.

ES.3.3 Alternative 3: Partial Preservation (Building I)

Under the Partial Preservation Alternative, Building I would remain in its current location and would be modernized as a classroom structure. Buildings A, L, and M, as well as the other buildings proposed for demolition under the Project, would be demolished and new buildings would be built to provide classroom and administrative space. The sports courts would be reconfigured to accommodate the retention of Building I; however, the number of courts would not change. Other than the modernization of this specific eligible historic structure, the remainder of campus would be developed with the buildings, landscaping, pathways, and lighting described under the Project.

Under Alternative 3, the existing spaces of Building I would continue to be used as classrooms with minor renovations to interior finishes and the rehabilitation of the building's exterior. However, the classrooms are under the California Department of Education's (CDE's) minimum square footage requirement of 960 SF. The classrooms are best suited for general instruction and would not be appropriate for Career and Technical Education (CTE) or music classrooms that require large areas or specialized equipment. In addition, the existing restrooms would require renovations, including relocation

or removal of numerous fixtures to meet accessibility codes. Toilet fixture partitions also need to be removed and replaced.

Airplane noise is significant on campus due to Inglewood High School's position within the 65 dB noise contour of Los Angeles International Airport. An environmental noise study was completed, and combined with further acoustic analysis, the District identified minimum requirements for various building specifications that need to be incorporated into any building rehabilitation on campus, which are as follows:

- Exterior Wall Assemblies: minimum STC 42
- Roof Assemblies: minimum STC 46
- Ceilings: minimum 0.7 NRC, 40 CAC. 6" Batt Insulation in Ceiling Cavity.
- Windows: minimum STC 43
- Mechanical Systems: Down-discharge units with spring vibration isolation curb. Duct liner.
- Exterior Doors: minimum STC 40

To protect the classroom spaces from aircraft noise, the following additional improvements are also recommended:

- Adding layers of continuous and batt insulation to the existing walls and roof/ceiling assemblies is likely required to increase the STC ratings of the envelope.
- All exterior windows are recommended to be replaced with high STC products.
- Interior ceiling tiles should be replaced.
- Exterior doors should be replaced.
- Replace single-zone package HVAC units, heaters, exhaust fans and associated accessories.
- Replace all original ductwork.

The District has determined that the renovations required to update the classrooms, provide adequate acoustic assemblies, and upgrade the toilet rooms exceed 50% of the replacement value of the building, as outlined by DSA, which triggers a requirement for a full seismic upgrade of Building I's structure.

A seismic mitigation study of Building I was completed to determine what improvements to Building I would be necessary to allow it to meet current Building Code seismic safety requirements. This study found that the anchorage between the exterior concrete walls and roof framing is insufficient for the out-of-plan loading. A new steel perimeter ledger would be required to address this. Additional measures were determined to be necessary for a full seismic upgrade including significant foundation reinforcement via micropiles or similar method. The existing concrete walls would also need to be strengthened utilizing fiber-reinforced polymer (FRP) measures if the existing walls are within design limits. If not, new concrete shear walls may be necessary. Diaphragm strengthening would also likely be required.

ES.3.4 Alternative 4: Expanded Partial Preservation (Buildings I, L, and M)

Under the Expanded Partial Preservation Alternative, Building I, would remain in its current location and would be modernized as a classroom structure. Buildings M and L would be retained in place until funding is available for modernization. Building A, as well as the other buildings noted for demolition as proposed under the Project, would be demolished, and new buildings would be built to provide classroom and administrative space. The sports courts would be reconfigured to accommodate the retention of Buildings I, L, and M; however, the number of courts would not change. Other than the retention of these specific eligible historical structures, the remainder of the campus would be developed with the buildings, landscaping, pathways, and lighting described under the Project.

Under Alternative 4, similar to Alternative 3, the existing spaces of Building I would continue to be used as classrooms with minor upgrades to interior finishes. However, Buildings L and M would simply be retained in place to protect their eligibility as historical resources; when future renovation and retrofits become more feasible in the future to allow for proposed modernizations to occur. As such, the historic integrity of Buildings L and M would be maintained, allowing the historical resources to remain eligible for listing. Therefore, the Alternative would result in reduced impacts as compared to the Project.

ES.3.5 Environmentally Superior Alternative

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project Alternative, would be considered the environmentally superior because it would not involve demolition of buildings and construction of new buildings throughout the Project Site, and assumes the current classrooms would continue to operate similar to existing conditions. Alternative 1 would not meet any of the Project Objectives and would avoid all of the Project's potentially significant impacts and would have less impacts compared to the Project. However, because Alternative 1 has been identified as the environmentally superior alternative, identification of another environmentally superior alternative among the Project's remaining "build" alternatives is required.

Alternative 2, the Full Preservation of Historic Buildings Alternative would involve demolition of fewer buildings compared to the Project, while still achieving some of the Project objectives. Alternatives 2 would eliminate the Project's significant unavoidable impact to cultural resources by retaining and renovating the existing eligible historic buildings. As shown in Table 6-1, Alternative 2 would result in three "similar" impacts for the issue areas analyzed compared to the Project and six "less" impacts compared to the Project. Alternative 2 is considered the environmentally superior alternative among the Project's "build" alternatives, as it is the only alternative besides the No Project Alternative that would eliminate the significant unavoidable impacts to cultural resources due to the retention of all of the eligible historic structures. In addition, the reduced demolition footprint of Alternative 2 would result in an incrementally reduced scale of impacts related to air quality, greenhouse gas emissions, archaeological resources, paleontological resources, and tribal cultural resources as compared to Alternatives 3 and 4. Alternative 2 would also fully meet three of the Project objectives and would partially meet two of the Project objectives, and would not achieve two of the stated Project objectives (reconstruct the school to provide a modernized campus and construct new buildings that bring the campus up to code). While all of the objectives outlined in Section 6.2 are important in meeting the District's goals, these two goals of providing a modernized

campus and constructing new buildings that bring the campus up to code are especially important to the success of the Project and the long-term operation of the school. Due to the campuses aged condition, the current buildings on campus, including the eligible historic buildings, do not provide the facilities that are code-compliant or meet the needs of current students. The Inglewood High School campus faces unique challenges due to the proximity to the Los Angeles International (LAX) flight path. None of the existing buildings adequately protect the students from airplane noise in their current condition. Thus, meeting the goals of providing a modernized campus and constructing new buildings that bring the campus up to code is also important in providing acoustic comfort at the campus. District students, teachers, and staff have been awaiting a high school that provides classrooms and facilities that are more modernized and appropriate for a variety of classroom types including laboratory classrooms and music classrooms. Overall, a holistic design for new buildings and a reorganized campus are required in order to address the full range of District objectives.

ES.4 Summary of Environmental Impacts

This section provides a summary of impacts, mitigation measures, and impacts after implementation of the mitigation measures associated with implementation of the Project. The summary is provided by environmental issue area below in **Table ES-1**, *Summary of Project Mitigation Measures*. Table ES-1 provides the impact statement for each issue area evaluated in Chapter 4, *Environmental Effects of the Project*.

TABLE ES-1
SUMMARY OF MITIGATION MEASURES

Environmental Impact	Mitigation Measures	Project Impact Determination
4.1 Aesthetics		
Regulations governing scenic quality (lighting)	**MM-AES-1:** Inglewood Unified School District shall program the lighting control system to restrict any activities to no later than 10:00 pm.	Less than Significant with Mitigation
4.2 Air Quality		
Consistency with applicable air quality plan	None Required	Less than Significant
Cumulative Considerable Increase of Criteria Pollutants in Nonattainment Area		
Construction	None Required	Less than Significant
Operation	None Required	Less than Significant
Sensitive Receptor Exposure To Pollutant Concentrations		
Construction	**MM-AQ-1:** Construction Equipment. The Applicant shall implement the following requirements for construction equipment operating at each Project site. These requirements shall be included in applicable bid documents and contractor(s) must demonstrate the ability to supply such equipment. Construction equipment shall include the following: • The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 25 horsepower (hp) or greater during Project construction where available within the Air Basin. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent. A copy of each unit's certified tier specification, BACT documentation, and CARB or Southern California Air Quality Management District (SCAQMD) operating permit at the time of mobilization of each applicable unit of equipment shall be provided.	Less than Significant with Mitigation
Operation	None Required	Less than Significant
4.3 Cultural Resources		
Substantial Adverse Change to a Historical Resource		
Direct Impacts	**MM HIST-1:** HABS-Like Survey (In Process) – In order to document the campus and the eligible buildings Building A, Building I, Building L, and Building M prior to demolition and/or modification, a Historic American Building Survey (HABS)-like report shall be prepared. The Project is not under Federal jurisdiction and therefore preparation of a HABS-like report is proposed. Three HABS-like reports, documenting Building A, Building I, and Building M, and the IHS Industrial Historic District shall be prepared in accordance with HABS guidelines. The reports shall include high resolution digital photographs rather than large format black-and-white prints and would be archived in local and state repositories only, not sent to the	Significant and Unavoidable

Environmental Impact	Mitigation Measures	Project Impact Determination
	Library of Congress. Principal photography shall include exterior contextual views, elevation views, and select interior views of significant spaces at Buildings A, I, M, and L in addition to limited general views of the IHS campus. A corresponding site plan/photo key with also be produced per National Park Service (NPS) format. The HABS-like photography will be completed in high-resolution digital format and printed on archival photo paper per NPS guidelines. Photography will be produced in high resolution digital capture. Written and graphic documentation of the campus, Buildings A, I, L, and M will be prepared per HABS Level II guidelines, which will provide a statement of significance, narrative histories, resource descriptions, and supporting documentation. The reports shall record the history of the subject property and Buildings A, I, L, and M, and their physical condition, both historic and current, through site plans, historic maps, and photographs, as well as current photographs, written data and text. Limited additional research will be conducted related to the original construction of each building and the role of each on the IHS campus. Hard copies of the approved documentation shall be submitted to the Inglewood Public Library, the Inglewood High School Library, and the City of Los Angeles Central Library where they will be publicly available, and a digital copy to the South Central Coastal Information Center (SCCIC) at California State University Fullerton, Department of Archaeology. **MM HIST-2:** Interpretive Exhibit – An Interpretative Exhibit, which would promote cultural awareness of the history of Inglewood High School including its early Inglewood Highschool Farm, Post-Long Beach Earthquake redevelopment, defense program and wartime vocational training, and the unique histories of eligible Buildings A, I, M, and the IHS Industrial Historic District, shall be developed and be located at a prominent location as part of the Project. The Interpretive Exhibit shall be developed by a qualified architectural historian and shall include comprehensive historical information regarding the campus historic and eligible building and will be visually rich including photographs and other 2-dimension or 3-dimension IHS ephemera. Every effort shall be made to locate the exhibit in the entrance building or other publicly accessible location. The Interpretative Exhibit shall present a photographic history of the campus, Buildings A, I, M, and the IHS Industrial Historic District, and showcase other information that would educate students and staff about the evolution of the high school over the course of its roughly 110-year history. The Interpretative Exhibit shall be completed and open after the new development as part of the Project is placed in service. In this manner, information about the property's construction and design as well as the associated history, would be retained and preserved in perpetuity on site. **MM HIST-3:** Book – A book comprehensively documenting the history of the Inglewood High School campus including the Inglewood Highschool Farm, Post-Long Beach Earthquake redevelopment, defense program and wartime vocational training, and the unique histories of eligible Buildings A, I, M, and the IHS Industrial Historic District, shall be developed. Utilizing the historical narrative developed for mitigation measure HIST-1, the book will include rich visual photographs, representative building plans, and other graphics depicting the character of the IHS campus, and the eligible Buildings A, I, M, and the IHS Industrial Historic District over time. The book shall be developed in a digital format that will be included on the Inglewood High School Unified School District's website for viewing and for digital download. Hard copies of the approved documentation shall be submitted to the	

Environmental Impact	Mitigation Measures	Project Impact Determination
	Inglewood Public Library, the Inglewood High School Library, and the City of Los Angeles Central Library where they will be publicly available. **MM HIST-4:** Campus Salvage Inventory (Completed) – In consultation with District staff and the Inglewood High School Alumni Group , a Campus Salvage Inventory plan was prepared which included the identification of features and ephemera located within the site and select buildings proposed to be demolished. The identified features include those that have cultural or historical value to the Inglewood High School Alumni Group, a volunteer organization of alumni who represent various graduation classes. The inventory is organized into a table with two phases: Phase 1 which indicates features that were removed in the Spring of 2025, and Phase 2 which indicates features that were removed after June 4, 2025. The table identifies features by an assigned asset number, feature name, a photograph of each feature, their original campus location, a brief feature description, suggested future placement location upon Project completion, and related notes regarding where a feature is currently stored or if another determination was made regarding feature commemoration, including preservation in-place or photo documentation prior to feature demolition. Prepared by the Inglewood High School Alumni Group, the table identifies select exterior campus site features including: four commemorative metal plaques, a sundial, flagpole, bronze bust status, in-situ mosaic tile array, a contemporary marquee sign, wood casework in Building A, Administration, and metal casework in Building R, Auditorium. Additionally, the inventory includes related high school ephemera such as sports trophies, newspaper clippings, spirit wear, certificates, a j-hook which would held a mirrored ball for dances, and annual yearbooks. Notable site features that were feasibly salvageable, in whole or in part, prior to demolition of the campus have been removed and are stored in the Inglewood Unified School District County Administrator's office or in DO Storage . Salvaged items may also be incorporated into interpretive displays within the school (if displayed in an appropriate, archival manner) or donated to museums or historical societies or other relevant organizations. The Campus Salvage Inventory will be updated upon Project completion to reflect any additional features identified and preserved during the demolition process, and to reflect final determinations regarding feature preservation, relocation, and/or demolition. A copy of the final Campus Salvage Inventory will be printed and included as an attachment to the version of the HABS-Like Survey as part of mitigation measure HIST-1 to be placed in the Inglewood High School Library.	
Indirect Impacts	None Required	Less than Significant
Substantial adverse change to an archaeological resource	**MM CUL-1:** Prior to ground disturbing activities, the District shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated, and the depth of excavation, and if found, the abundance and type of archaeological resources encountered, as determined by the Qualified Archaeologist. The frequency of monitoring shall be determined based on the factors presented above and can be reduced to part-time inspections. The monitoring can also be ceased as determined appropriate by the Qualified Archaeologist if older Quaternary alluvium sediments (not conducive to retaining prehistoric	Less than Significant with Mitigation

Environmental Impact	Mitigation Measures	Project Impact Determination
	archaeological resources) are encountered. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event. **MM CUL-2:** In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, Native American artifacts or features, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by the Qualified Archaeologist and a Gabrielino Tribe. If the resources are Native American in origin, the Gabrielino Tribe shall consult with the District and Qualified Archaeologist regarding the treatment and curation of any prehistoric archaeological resources. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the District to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall incorporate the Gabrielino Tribe's treatment and curation recommendations. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material and/or the Gabrielino Tribe. If no institution or the Gabrielino Tribe accept the resources, they may be donated to a local school or historical society in the area for educational purposes. **MM CUL-3:** Upon completion of the archaeological monitoring, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted to the District, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.	
Disturb Human Remains	None Required	Less than Significant

Environmental Impact	Mitigation Measures	Project Impact Determination
4.4. Energy		
Result In Wasteful, Inefficient, Or Unnecessary Consumption Of Energy		
Construction	None Required	Less than Significant
Operation	None Required	Less than Significant
Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency		
Construction	None Required	Less than Significant
Operation	None Required	Less than Significant
4.5 Geology and Soils- Paleontological Resources		
Directly or indirectly destroy unique paleontological resources or unique geologic resource	**MM-GEO-1:** Prior to ground disturbing activities, the Applicant shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) standards for a Professional Paleontologist. The Qualified Paleontologist shall examine construction plans and prepare a Paleontological Resources Impact Mitigation Plan (Plan). This Plan shall include geological and paleontological contextual information, methods for paleontological construction monitoring, protocols for inadvertent discoveries, methods for sediment sampling and screening, including requirements for the radiocarbon dating of specimens or other materials, and final reporting requirements. The Qualified Paleontologist shall attend a pre-construction meeting to discuss the monitoring requirements with construction personnel and shall be responsible for overseeing paleontological monitors (meeting SVP standards) that will observe grading and excavation activities. **MM-GEO-2:** Paleontological monitoring shall be conducted during construction excavations into undisturbed older alluvial sediments (also noted as the Lakewood Formation) that exceed three feet in depth. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting and wet screening sediment samples of promising horizons for smaller fossil remains. If significant vertebrate fossils are found by screening, it will be necessary to collect a 6,000-pound sample for screening, per Society of Vertebrate Paleontology Guidelines (SVP, 2010). The sample can be collected by construction machinery and stockpiled and processed in a safe location on site, or transported to another site for processing. The frequency of monitoring inspections shall be determined by the Qualified Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Paleontologist. **MM-GEO- 3:** If a potential fossil is found, the Qualified Paleontologist shall have authority to temporarily stop excavation activity or 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 by the Qualified Paleontologist 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 Qualified Paleontologist'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 preservation in	Less than Significant with Mitigation

Environmental Impact	Mitigation Measures	Project Impact Determination
	place is not feasible, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location. **MM-GEO-4:** Any fossils recovered during Project-related excavations shall be prepared to the point of identification. The residue form sediment samples shall be dried and sorted with a binocular dissecting microscope. Both macrofossils and vertebrate microfossils shall be prepared to the point of identification, identified, and curated into an accredited repository. The Qualified Paleontologist shall prepare a final report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall accompany the specimens to the accredited repository. The report shall also be submitted by the Applicant to the Inglewood Unified School District to signify the satisfactory completion of the Project and required mitigation measures.	
4.6 Greenhouse Gas Emissions		
Directly or Indirectly Generate Greenhouse Gas Emissions		
Conflict with any Applicable Plan, Policy, Regulation, or Recommendation of an Agency Adopted to Reduce GHG Emissions		
ghg	None Required	Less than Significant
Operation	None Required	Less than Significant
4.7 Noise		
Generate Substantial Temporary or Permanent Increase in Ambient Noise in Excess of Standards Established in Local General Plan or Noise Ordinance, or Applicable Standards of Other Agencies		
On-Site Construction	**MM-NOI 1:** The District and/or its contractor shall implement the following features during Project construction: The contractor shall maintain all construction tools and equipment in good operating order according to manufacturers' specifications. The contractor shall equip internal combustion engines with properly operating or improved mufflers over factory that are free from rust, holes, and leaks. For construction equipment that utilize internal combustion engines, the contractor shall ensure the engine's housing doors are kept closed, and shall install noise-insulating material mounted on the engine housing consistent with manufacturers' guidelines, if required to achieve the required 8 dBA noise reduction. The combined use of improved mufflers, closed engine housing doors, and noise-insulating material mounted on the engine housing (if required) shall achieve a minimum noise reduction of 8 dBA, which shall be documented in equipment specification sheets. As an option, in lieu of installing improved mufflers, closed engine housing doors, and/or noise-insulating material mounted on the equipment engine housing, the contractor may install temporary noise barriers along the Project Site boundary. The temporary noise barriers shall be a minimum of 8 feet tall along the eastern and southern boundaries and a minimum of 6 feet tall along the northern boundary of the Project Site. The temporary noise barriers shall be composed of solid material such as plywood or similar and shall block the line-of-sight from construction activities occurring on the Project Site to the residential,	Less than Significant with Mitigation

Environmental Impact	Mitigation Measures	Project Impact Determination
	church, and open space park uses to the south, southeast, and east of the Project Site. As an option, in lieu of installing improved mufflers, closed engine housing doors, and/or noise-insulating material mounted on the equipment engine housing, noise absorbing material rated to achieve a minimum 8 dBA reduction in noise may be applied to the existing wall on the west side of the Project site. If the contractor selects to use temporary noise barriers or noise absorbing material, they shall be installed prior to noise-generating construction activities occurring within approximately 200 feet of the eastern, western, northern and/or southern Project Site boundaries.	
Off-Site Construction	None Required	Less than Significant
On-Site Operation	None Required	Less than Significant
Off-Site Operation	None Required	Less than Significant
Generate Excessive Groundborne Vibration or Groundborne Noise		
Structural Damage		
Construction	**MM-NOI-2:** For demolition, grading, and building construction activities occurring within 20 feet or less from off-site residential buildings or on-site existing buildings that will be retained and remodeled as part of the Project, construction vibration monitoring shall be conducted to document conditions of the buildings prior to, during, and after groundborne vibration-generating demolition, grading, and building construction activities. The construction vibration monitoring shall be implemented by an architect meeting the Secretary of the Interior's Professional Qualification Standards. The architect shall conduct the following tasks: • Identify the Project's demolition, grading, and building construction activities occurring and heavy-duty equipment in use within 20 feet or less from off-site residential buildings or on-site existing buildings that will be retained and remodeled as part of the Project that have the potential to generate groundborne vibration; • Perform a photo survey, elevation survey, and tile/crack monitoring survey for the residential structures and on-site structures within the school located within 20 feet of vibration-generating Project construction activities. Surveys shall be performed prior to and in regular intervals (i.e., at least weekly) during of all vibration-generating activities within 20 feet or less of the structures on-site. • Conduct a post-construction survey on the structures following the completion of vibration-generating activities occurring within 20 feet of the structures. The applicant shall be required to make appropriate repairs in accordance with the Secretary of the Interior's Standards where damage has occurred as a result of construction activities as identified by the architect.	Less than Significant with Mitigation
Operation	None Required	Less than Significant

Environmental Impact	Mitigation Measures	Project Impact Determination
Human Annoyance		
Construction	**MM-NOI-3:** Within 100 feet of an occupied structure where human annoyance may be perceptible (e.g. residences), the contractor shall schedule construction activities during less sensitive daytime hours of 8:00 a.m. to 5:00 p.m. to avoid annoyance impacts. The contractor shall also use alternative equipment with less horsepower (i.e., 100 horsepower or less) if such equipment is commercially available (i.e., can be obtained from a vendor within the greater Los Angeles area) and can perform the required work within a similar duration.	Less than Significant with Mitigation
Operation	None Required	Less than Significant
Located within a private airstrip, airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport	None Required	Less than Significant
4.8 Transportation		
Conflict with program, plan, ordinance, or policy	None Required	Less than Significant
Conflict or be inconsistent with CEQA guidelines section 15064.3, subdivision (b)	None Required	Less than Significant
Increase hazards due to a geometric design feature	None Required	Less than Significant
Result in inadequate emergency access	None Required	Less than Significant
4.9 Tribal Cultural Resources		
Tribal Cultural Resources	**MM-TCR-1**: Prior to the issuance of a demolition permit for the Project, the District shall retain a Native American Monitor(s) from a Gabrielino Tribe (or Tribes). The Native American Monitor(s) shall be present during the following construction activities that have the potential for encountering tribal cultural resources: demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Project, whether on the Project Site or in connection with Project off-site improvements (collectively “ground disturbing activities”). Notwithstanding the foregoing, Native American monitoring shall not be required for any moving of soils that have been monitored or observed prior to their disturbance and subsequently disturbed or displaced by Project-related construction. The Tribe(s) shall	Less than Significant with Mitigation

	prepare a monitoring agreement for review and approval by the District that outlines the roles and responsibilities of the Native American Monitor(s). Prior to commencement of ground disturbing activities, a Tribal Cultural Resources Sensitivity Training session shall be held for those construction personnel who will be directly involved in the ground disturbing activities. The training session shall be carried out by the Native American Monitor(s) and shall focus on how to identify tribal cultural resources that may be encountered during ground disturbing activities and the procedures to be followed in such an event. If the Native American Monitor(s) is not present at the Project Site on any given workday, the ground disturbing activities may continue if the workers involved in such activities attended the training session. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor(s) in the event there appears to be little to no potential for impacting tribal cultural resources. Native American monitoring shall conclude no later than conclusion of ground disturbing activities. **MM-TCR-2**: The Native American Monitor(s) shall complete daily monitoring logs that 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, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the District upon written request to the Tribe(s). The District shall not be deemed to be out of compliance with this measure if the Native American Monitor(s) fails to complete or submit any such monitoring logs. **MM-TCR-3**: In the event of a discovery of potential tribal cultural resources at the Project Site, the Qualified Archaeologist identified in Mitigation Measure CUL-1 (after consultation with the Native American Monitor[s]) shall have the authority to temporarily divert, redirect, or halt ground-disturbance activities to allow identification, evaluation, and potential recovery of such potential resources. After consulting with the Tribe(s) and the District, the Qualified Archaeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where ground-disturbing activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. Within three (3) business days of such discovery, a meeting shall take place between the District, the Qualified Archaeologist, and the Tribe(s) to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Tribe(s) and the Qualified Archaeologist, the District determines, based on substantial evidence, that the resource is in fact a tribal cultural resource, the Qualified Archaeologist shall develop a reasonable and feasible treatment plan, with input from the Tribe(s) as necessary. The treatment measures in the treatment plan shall be in compliance with any applicable federal, State, or local laws, rules or regulations. The treatment plan shall also include measures regarding the curation of the recovered resources. If there is disagreement between the Tribes and the Qualified Archaeologist as to the treatment measures for the resource, the	

Environmental Impact	Mitigation Measures	Project Impact Determination
	District, as lead agency, shall make the final decision on treatment after receiving input from the parties involved. The District may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the treatment measures developed and approved pursuant to the process set forth in the above paragraphs. The recovered Native American resources may be placed in the custody of the Tribe(s), who may choose to use them for their educational purposes or they may be curated at a public, non-profit institution (such as the University of California Los Angeles) with a research interest in the materials. If neither the Tribe(s) nor an institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.	

Source:ESA, 2025

CHAPTER 1
Introduction

1.1 CEQA Overview

This Draft Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) and addresses the potential environmental effects associated with the Inglewood High School Reconstruction Project (Project). The Inglewood Unified School District (District), the lead agency, proposes the reconstruction of the existing Inglewood High School on an approximately 18-acre site (Project Site) located at 231 South Grevillea Avenue in the western central portion of the City of Inglewood (City). This Draft EIR provides an overview of the Proposed Project and considered alternatives and identifies mitigation measures designed to reduce the level of potentially significant impacts.

1.2 Purpose and Use of this Draft EIR

The purpose of this Draft EIR is to inform decision-makers and the general public of the potential environmental impacts resulting from the Project. The District is the Lead Agency under the California Environmental Quality Act (CEQA) responsible for preparing this Draft EIR. This Draft EIR has been prepared in conformance with CEQA (California Public Resources Code [PRC] Section 21000 et seq.), and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.). The principal CEQA Guidelines sections governing content of this document are Sections 15120 through 15132 (Contents of an EIR), and Section 15161 (Project EIR).

The District is responsible for processing and approving the Project pursuant to CEQA Statute Section 21067. The District will consider the information in this Draft EIR, along with other information that may be presented during the CEQA process, including but not limited to the Initial Study and a Final EIR. The EIR will be used in connection with other permits and approvals necessary for the construction and operation of the Project.

In accordance with CEQA Guidelines Section 15121, this Draft EIR is an informational document that will inform public agency decision-makers and the public generally of the environmental effects associated with the Project, and ways to minimize significant environmental effects through mitigation measures or reasonable alternatives to the Project. For some effects, significant environmental impacts cannot be mitigated to a level considered less than significant; in such cases, impacts are considered significant and unavoidable. In accordance with CEQA Guidelines Section 15093(b), if a public agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts where impacts cannot be mitigated to less than significant levels), the agency must state in writing the specific reasons for approving the project, based on the Final EIR and any other

information in the public record for the project. This is known as a "statement of overriding considerations."

This Draft EIR analyzes the environmental effects of the Project to the degree of specificity appropriate to the activities proposed by the Project, as required under CEQA Guidelines Section 15146. This analysis considers the activities associated with the Project, to determine the short-term and long-term effects associated with their implementation. This Draft EIR discusses both the direct and indirect impacts of this Project, as well as the cumulative impacts associated with other past, present, and reasonably foreseeable future projects in the vicinity. CEQA requires the preparation of an objective, full disclosure document to inform agency decision-makers and the general public of the direct and indirect environmental effects of the proposed Project, including mitigation measures and reasonable alternatives that can reduce or eliminate any identified significant adverse impacts.

1.3 EIR Scoping Process

In compliance with Section 15201 of the State CEQA Guidelines, the City has taken steps to provide opportunities for public participation in the environmental review process. In association with preparation of the Draft EIR, efforts were made to contact various State, regional, and local government agencies and other interested parties to solicit comments and inform the public of the Project. As further described below, this included the distribution of an Initial Study and Notice of Preparation (NOP) of an Environmental Impact Report.

1.3.1 Initial Study

In accordance with CEQA Guidelines Section 15063(a), the City prepared an Initial Study to identify potential environmental impacts. The Initial Study determined that the Project had the potential to result in significant impacts associated with a number of environmental issues. As a result, the Initial Study led to a determination that a Draft EIR should be prepared to address those issues where the Project could result in significant environmental impacts, and to consider feasible mitigation measures and alternatives to the Project.

The Draft EIR focuses primarily on changes in the environment that would result from the Project, individually and cumulatively with other development projects. The Draft EIR identifies potentially significant direct and indirect impacts resulting from construction and operation of the Project and provides mitigation measures to reduce or avoid such effects. Based on public input and the results of the Initial Study, this Draft EIR addresses environmental effects in the following areas:

- Aesthetics
  - Lighting only
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
  - Paleontological Resources only

- Greenhouse Gas Emissions
- Noise
- Transportation
- Tribal Cultural Resources

Based on the Initial Study, issues for which no significant impacts are anticipated to occur are discussed briefly as a part of Chapter 6, *Other CEQA Considerations*, of this Draft EIR. The analyses supporting these determinations are provided in the Initial Study included as Appendix A-2 of this Draft EIR.

1.3.2 Notice of Preparation

Pursuant to the provision of CEQA Guidelines Section 15082, the District circulated a Notice of Preparation of an Environmental Impact Report (NOP) to State, regional, and local agencies, and members of the public for a 30-day review period commencing July 9, 2025 and ending August 7, 2025, which was later extended to August 14, 2025. The purpose of the NOP was to formally notice that the District was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. See Appendix A-1 of this Draft EIR for a copy of the NOP.

1.3.3 Comments Received

During the public review period for the NOP, four commenters submitted responses to the NOP. Correspondence was received from the California Department of Transportation (Caltrans), California Department of Fish and Wildlife (CDFW), California Department of Toxic Substances Control (DTSC), and the Native American Heritage Commission (NAHC). All written comments are provided in Appendix A-3, of this Draft EIR and summarized in the Executive Summary.

1.4 Format of the Draft EIR

The Draft EIR includes an Executive Summary, nine chapters, and appendices, which are organized as follows:

Executive Summary. This chapter of the Draft EIR provides an overview of the entire document in a concise, summarized format. It briefly describes the Project (location and key Project features), the CEQA review process and focus, identifies effects found to be significant and unavoidable, identifies areas of controversy, provides a summary of the Project alternatives (descriptions and conclusions regarding comparative impacts), and provides a summary of Project impacts, Project Design Features and mitigation measures, and the level of impact significance following implementation of mitigation measures.

1. **Introduction.** This chapter provides a summary of the Project, describes the purpose of the EIR, including CEQA compliance requirements, steps undertaken to date regarding implementation of the CEQA process, and also summarizes the Draft EIR's organization.

2. **Environmental Setting.** This chapter presents an overview of the Project's environmental setting, including on-site and surrounding land uses. This section also provides a list and the mapped locations of past, present, and probable future related projects considered in the analysis of potential Project contributions to cumulative impacts.

3. **Project Description.** This chapter describes the location, background and existing conditions, Project objectives, physical and operational characteristics of the Project, and requested entitlements.

4. **Environmental Impact Analysis.** This chapter contains the environmental setting, regulatory framework, methodology, thresholds to determine level of significance, Project Characteristics and/or Project Design Features, Project-specific and cumulative impact analyses, mitigation measures, and conclusions regarding the level of significance after mitigation for each of the following environmental issues: 1) Aesthetics – Lighting; 2) Air Quality; 3) Cultural Resources; 4) Energy; 5) Geology and Soils – Paleontological Resources; 6) Greenhouse Gas Emissions; 7) Noise; 8) Transportation; and 9) Tribal Cultural Resources.

5. **Other CEQA Considerations.** This chapter includes a discussion of issues required by CEQA that are not covered in other chapters. This includes irreversible environmental changes, significant unavoidable impacts, reasons why the Project is being proposed notwithstanding significant unavoidable impacts, growth-inducing impacts, potential secondary effects related to Project mitigation measures, effects found not to be significant in the Initial Study, and effects found to be less than significant in the Draft EIR (before mitigation).

6. **Alternatives.** This chapter describes a reasonable range of alternatives to the Project, including the (1) No Project/No Build Alternative, (2) Full Preservation Alternative, (3) Partial Preservation Alternative, and (4) Expanded Partial Preservation Alternative. This chapter also evaluates the environmental effects of the alternatives for each issue area analyzed in the Draft EIR, though not at the same level of detail as analyzed for the Project.

7. **List of EIR Preparers and Organizations and Persons Contacted.** This chapter lists the persons, public agencies, and organizations that were consulted or who contributed to the preparation of this Draft EIR.

8. **References.** This chapter lists the references and sources used in the preparation of this Draft EIR.

The Environmental Analyses in this Draft EIR are supported by the following appendices:

- Appendix A - Notice of Preparation (NOP), Initial Study, and Comments on the NOP
  - A-1 Notice of Preparation
  - A-2 Initial Study
  - A-3 NOP Comment Letters
- Appendix B - Lighting Studies
- Appendix C - Air Quality and Greenhouse Gas Emissions Calculations
  - C.1-1 Assumptions
  - C.1-2 Construction Air Quality Calculations and Modeling

  - C.1-3 Construction Health Risk Assessment
  - C.1-4 Operational Air Quality Calculations and Modeling
  - C.2-1 Construction Greenhouse Has Calculations and Modeling
  - C.2-2 Operational Greenhouse Gas Calculations and Modeling
- Appendix D - Archaeological Resources Assessment Report and Historic Resources Assessment
  - D-1 Archaeological Resources Assessment Report
  - D-2 Historic Resources Assessment
- Appendix E - Energy Calculations
  - E-1 Construction Energy Calculations
  - E-2 Operational Energy Calculations
- Appendix F - Paleontological Resources Report
- Appendix G - Noise Calculations
  - G.1 Noise Measurements
  - G.2 Construction Noise Calculations
  - G.3 Traffic Noise Calculations
- Appendix H - VMT Screening Assessment Memo
- Appendix I - AB 52 Consultation Materials

1.5 Public Review of the Draft EIR

The Draft EIR is subject to a 45-day review period in which the document is made available to responsible and trustee agencies and interested parties. In compliance with the provision of CEQA Guidelines Sections 15085(a) and 15087, the City, serving as the Lead Agency: (1) prepared and transmitted a Notice of Completion (NOC) to the State Clearinghouse; (2) published a Notice of Availability (NOA) of a Draft EIR which indicated that the Draft EIR was available for public review at the District offices; (3) provided copies of the NOA and Draft EIR to the Inglewood Unified High School Library at 10500 South Yukon Avenue, Inglewood, CA 90303; (4) posted the NOA and the Draft EIR on the District's website: https://www.inglewoodusd.com/apps/pages/public-notices; (5) posted a NOA to a newspaper with regional circulation; (6) sent a NOA to the last known name and address of all organizations and individuals who previously requested such notice in writing or attended public meetings about the Project; and (7) filed the NOA with the County Clerk. The public review period commenced on December 19, 2025 and will end on February 3, 2026 for a total of 47 days.

Any public agency or members of the public desiring to comment on the Draft EIR must submit their comments in writing or send them via email to the following address prior to the end of the public review period:

Mail: Jordan Miles
Inglewood Unified School District
401 South Inglewood Avenue
Inglewood, California 90301

Email: IHSconstruction@Inglewoodusd.com

Upon the close of the public review period, the District will proceed to evaluate and prepare responses to all relevant oral and written comments received from public agencies and other interested parties during the public review period. A Final EIR will then be prepared. The Final EIR will consist of the Draft EIR, any necessary revisions to the Draft EIR, comments submitted by responsible agencies or reviewing parties during the public circulation period for the Draft EIR, and District responses to those comments. After the Final EIR is completed and at least 10 days prior to its certification by the District Board of Education[1], responses to comments made by public agencies on the Draft EIR will be provided to the commenting agencies.

[1] Prior to approval of the Project, the District, as Lead Agency and decision-making entity, is required to certify that the Final EIR has been completed in compliance with CEQA, that the Project has been reviewed and the information in the Final EIR has been considered, and that the Final EIR reflects the independent judgement of the City.

CHAPTER 2
Environmental Setting

2.1 Overview of Environmental Setting

CEQA Guidelines Section 15125 requires that an EIR include a description of the existing environment. This chapter provides a general overview of the environmental setting for the Project, however, detailed information on existing conditions for each environmental resource area evaluated in this Draft EIR is provided in Chapter 4, *Environmental Effects of the Project*. This chapter also provides an overview of related projects that are considered in the Draft EIR in evaluating cumulative impacts that could result from the Project together with other projects.

2.1.1 On-Site Conditions

The approximately 18-acre Project Site is located at 231 South Grevillea Avenue in the western central portion of the City of Inglewood (City). Primary regional access is provided by the Interstate 405 (I-405), located approximately 0.6 miles east of the Project Site, and I-105, located approximately 1.8 miles north of the Project Site. Local access to the Project Site is provided to the Project Site via West Manchester Boulevard and West Kelso Street.

The Project Site is occupied by Inglewood High School. The primary campus development is situated in the eastern portion of campus, and consists of classroom and administrative buildings. Athletic courts and fields are located on the western portion of the campus. The Project Site is essentially flat with a grade difference of about 6 feet from the northeast corner of the property to the southwest corner.

The Inglewood High School campus currently includes 18 classroom buildings (including permanent classroom buildings and portable classroom buildings). In addition to classroom buildings, the Inglewood High School campus includes a fine arts and administration building, an auditorium, locker rooms, library, performing arts building, adult education building, continuing education high school, and home economics building. The sidewalks adjoining the Project Site to the north, west, and south are landscaped with street trees and trees are scattered throughout the existing surface parking lot.

Tennis courts, basketball courts, a batting cage, and athletic fields are located west of the majority of the classroom buildings, and extend to the western Project Site boundary. In addition, there are existing tennis courts north of Building I as well as existing basketball courts. Competition sports events occur at other District locations. Covered and uncovered walkways and student seating areas are located between the campus buildings. Landscaping is limited to trees and pockets of grass located around campus.

The Continuing Education High School and After School Education High School buildings are separated from the main campus by fences. These two buildings are located in the southwestern portion of the site

along West Kelso Street and have their own parking lot and driveway. While they provide support to the high school they operate separately.

The majority of the Project Site consists of buildings, walkways, and sports fields. The western portion of the Project Site is mostly pervious and contains grasses and vegetation. There is minimal landscaping on the campus. There are 29 trees currently on the campus, which is the primary form of landscaping within the Project Site. The quantity and species of trees that exist on the campus provide limited canopy coverage. The outdoor open space and circulation areas are in some instances cracked and provide accessibility issues. Turf is present throughout several areas on campus, including at the front of the school and at the athletic field. Automatic irrigation is not currently available throughout the site. There are some benches and picnic tables and walls that provide outdoor seating. Monument signs and murals are in various locations throughout the campus.

The Inglewood High School campus currently includes a surface parking lot located west of the Auditorium along the southern edge of the campus along West Kelso Street. Access to the parking lot is via three entrances along West Kelso Street. The parking lot provides 63 total parking spaces, with 61 standard vehicle spaces and 2 ADA accessible spaces. This parking area is currently used by faculty and staff. In addition, there is an existing parking lot south of the Music Building (Building S), which includes 30 total parking spaces. There is no visitor or student parking available on the campus. Bicycle parking is provided in a shelter between the tennis courts and the library.

Students arrive at school by car, walk, bike, or use public transportation. School bus service is not provided except for special education students. There is currently no formal loading zone (i.e., curb markings or posted signage) designated; drop-off/pick-up loading activities occur generally along South Grevillea Avenue and West Kelso Street.

Inglewood High School has a capacity of 1,200 students and 70 staff members. Morningside High School is located approximately 2.0 miles southeast of the Project Site. After completion of the Project, students from Morningside High School will be transferred to Inglewood High School. Due to declining enrollment at both schools, with the Morningside High School students being transferred to Inglewood High School, the 1,200 student capacity, for which the school is currently designed, is not anticipated to be exceeded. The school year runs from late August through early June; summer school sessions also occur on campus. School hours and the associated bell schedule generally is between 8:30 a.m. to 3:15 p.m. Monday through Friday, with the exception that Tuesday end time is 2:20 p.m. In addition, several after-school clubs and organizations have activities on the campus. The campus does not include competition fields for football, softball, baseball or soccer, and these events occur at other District locations.

Based on the Inglewood Zoning Map, the Project Site is located within the Downtown Transit Oriented District of the City (City of Inglewood, 2023). More specifically, based on the Downtown Transit Oriented District Development Plan and Design Guidelines, the Project Site is located within the Civic Center District, and is zoned and designated as Civic Center (C-C). The C-C district allows government offices, schools and other public facilities, as well as limited private office and retail (City of Inglewood, 2016). The Project would be consistent with the land use designation and the zoning.

2.1.2 Surrounding Land Uses

The Project Site is bounded to the north by West Manchester Boulevard, commercial uses, Inglewood City Hall and the Inglewood Public Library. Residential homes and a retirement community are located to the west of the Project Site, with residential homes and West Kelso Street to the south. Additionally, South Grevillea Avenue and a multi-family apartment building are located to the east of the Project Site.

The Project Site is located within a residential neighborhood comprised primarily of single-family (one- and two-story) homes, along with some commercial uses and government facilities, including Inglewood City Hall and the Public Library. The SoFi Stadium is located approximately 0.7 miles to the southeast of the Project Site, which is within the Hollywood Park Specific Plan. The Project Site is located approximately 1.8 miles northeast of the Los Angeles International Airport (LAX) and approximately 2.8 miles northwest of the Hawthorne Municipal Airport.

2.2 Related Projects

CEQA requires that EIRs analyze cumulative impacts. As defined in CEQA Guidelines Section 15355, a cumulative impact would result from the combination of the project evaluated in the EIR together with other projects that would cause related impacts. CEQA Guidelines Section 15130(a) states that an EIR must discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in Section 15065(a)(3). Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," a lead agency need not consider that effect significant but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. When the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR must briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project's contribution is less than cumulatively considerable if a project is required to implement or fund its fair share of mitigation measures designed to alleviate the cumulative impact. A lead agency must identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less than significant.

In addition, CEQA Guidelines Section 15130(b) states that the analysis of cumulative impacts shall reflect the severity of the impacts and the likelihood of occurrence, but the discussion need not provide as great of detail as provided for the effects attributable to the project alone. Instead, the discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of the other projects which do not contribute to the cumulative impact.

Under CEQA Guidelines Section 15065(a)(3), a project has "cumulatively considerable" or significant cumulative impacts, when its incremental effects "are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

For an adequate discussion of significant cumulative impacts, the CEQA Guidelines (Section 15130(b)(1)(A) and (B)) allow an EIR to determine cumulative impacts and reasonably foreseeable growth based on either of the following methods:

Cumulative impacts are anticipated impacts of the proposed project along with reasonably foreseeable growth. Reasonably foreseeable growth may be based on either:

- A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts; or
- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental planning document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

For the Project's cumulative impacts analysis, a list of related projects is used as the primary basis for evaluation. The list is based on coordination with the City of Inglewood. The list of 12 related projects is provided in **Table 2-1**, with their locations identified in **Figure 2-1**.

TABLE 2-1
RELATED PROJECTS LIST

No. [a]	Location	Land Use	Size	Unit
1 [b]	222 W. Spruce Avenue	Residential	10	DU
2	101, 125, 139, 140, 150 Market Street	Residential	50	DU
		Retail	40,000	SF
3	336 W. Hillcrest Boulevard	Residential	65	DU
4	201 N. La Brea Avenue	Residential	144	DU
5	419 S. Eucalyptus Avenue	Residential	6	DU
6	315 W. Queen Street	Residential	21	DU
7	317 S La Brea Avenue	Residential	311	DU
		Retail	22,000	SF
8	415 Grace Avenue	Residential	8	DU
9	225 N. La Brea Avenue	Residential	137	DU
10	411 E. Kelso Street	Residential	60	DU
11	330 Florence Avenue	Residential	148	DU

Notes: du = dwelling units

a. Related projects list based on information from City of Inglewood in coordination with LLG.

Source: LLG, 2025

Although the projects listed in Table 2-1 serve as the primary basis for evaluation of cumulative impacts, the related projects or methodology used to address cumulative impacts may vary among certain environmental issues and topics due to their unique characteristics. The cumulative analyses for each environmental issue, including the identification of relevant related projects are provided in their applicable sections in Chapter 4, *Environmental Effects of the Project*, of this Draft EIR.

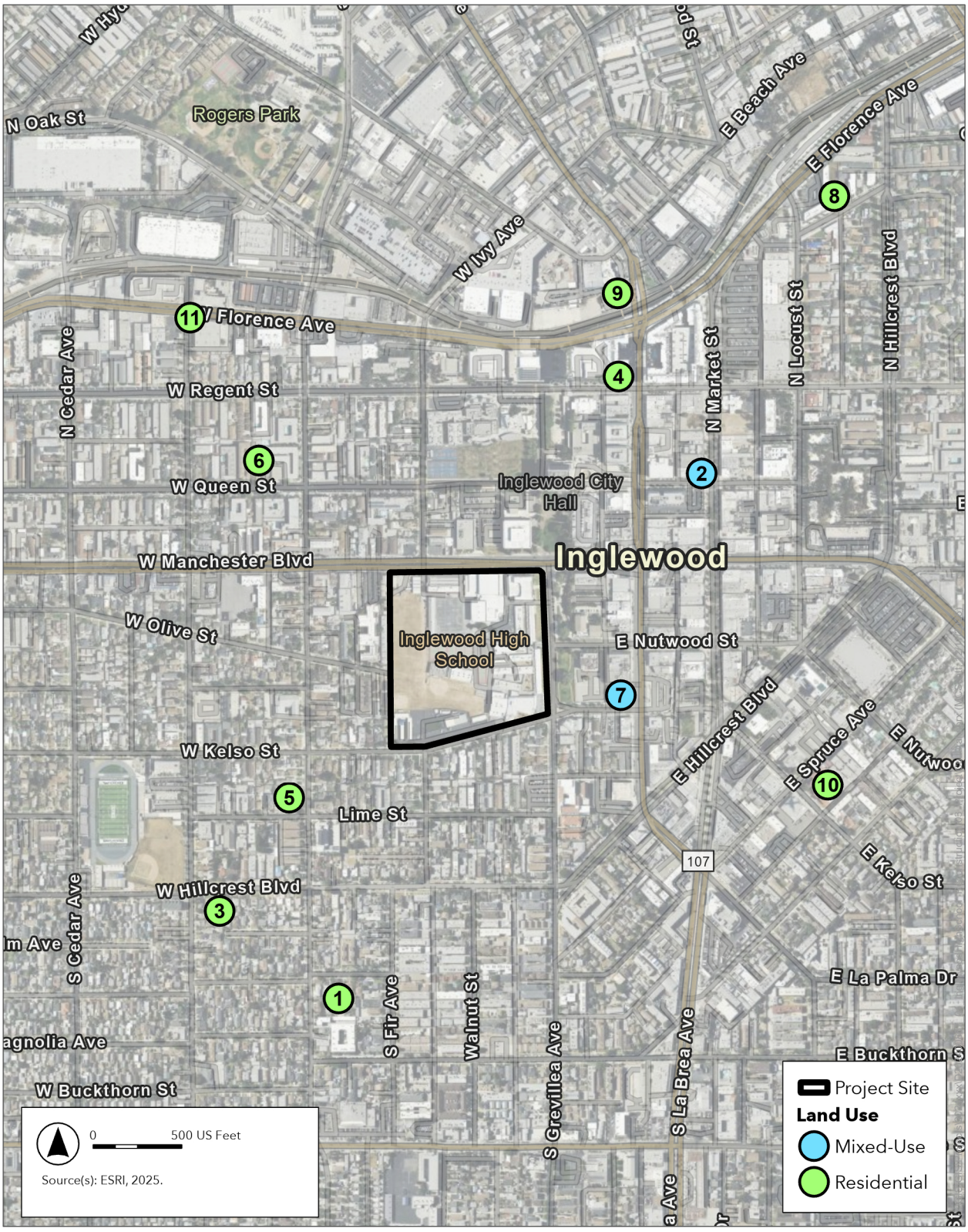


Figure 2-1
Related Projects Map

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CHAPTER 3
Project Description

3.1 Introduction

The Inglewood Unified School District (District), as the lead agency under the California Environmental Quality Act (CEQA), has prepared this Draft Environmental Impact Report (EIR) to evaluate the potential environmental impacts associated with the Inglewood High School Reconstruction Project (Project). The Project involves the demolition of existing buildings, partial renovation of existing buildings, and construction of six new buildings. Recreational components include the demolition and reconstruction of the basketball and tennis courts, installation of a combination softball/football/soccer artificial turf field at the western edge of campus, and installation of lights to illuminate the courts and fields. The Project would result in the removal of the existing asphalt areas, and landscaping improvements would be included throughout the Inglewood High School campus (Project Site).

3.2 Project Location and Surrounding Uses

Inglewood High School is located at 231 South Grevillea Avenue in the western central portion of the City of Inglewood within Los Angeles County, California. As shown in **Figure 3-1**, the Project Site is located approximately 0.6 miles east of Interstate 405 (I-405), approximately 1.8 miles north of I-105, and approximately 4.2 miles west of I-110. The Project Site is approximately 18 acres in size and is comprised of four Assessor Parcel Numbers (APNs): 4020-017-900, 4020-016-900, 4020-025-900, and 4020-026-900.

As shown in **Figure 3-2**, the Project Site is bounded to the north by West Manchester Boulevard, commercial uses, Inglewood City Hall and the Inglewood Public Library. Residential homes and an assisted living facility/ retirement home are located to the west of the Project Site, with residential homes and West Kelso Street to the south. Additionally, South Grevillea Avenue and a multi-family apartment building are located to the east of the Project Site.

The Project Site is located within a residential neighborhood comprised primarily of single-family (one- and two-story) homes, along with some commercial uses and government facilities, including Inglewood City Hall and the Public Library. The SoFi Stadium is located approximately 0.7 miles to the southeast of the Project Site, which is within the Hollywood Park Specific Plan. The Project Site is located approximately 1.8 miles northeast of the Los Angeles International Airport (LAX) and approximately 2.8 miles northwest of the Hawthorne Municipal Airport.

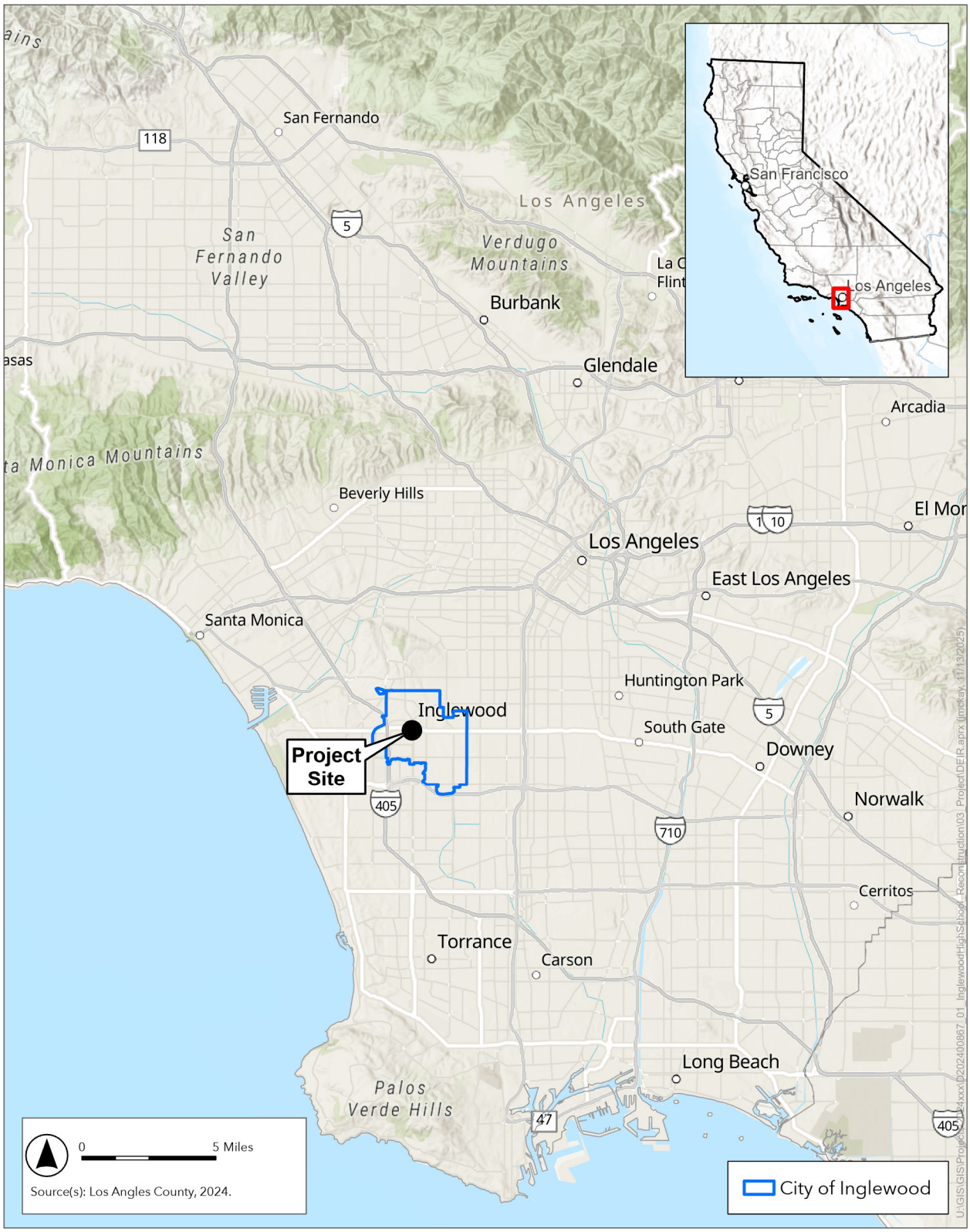


Figure 3-1
Regional Location Map
Inglewood High School Reconstruction



Figure 3-2
Project Location
Inglewood High School Reconstruction

3.3 Existing Conditions

The Project Site is currently occupied by Inglewood High School. The primary campus development is situated in the eastern portion of campus, and consists of classroom and administrative buildings. Athletic courts and fields are located on the western portion of the campus. The Project Site is essentially flat with a grade difference of about 6 feet from the northeast corner of the property to the southwest corner. (Geolabs-Westlake Village [GWV] 2024).

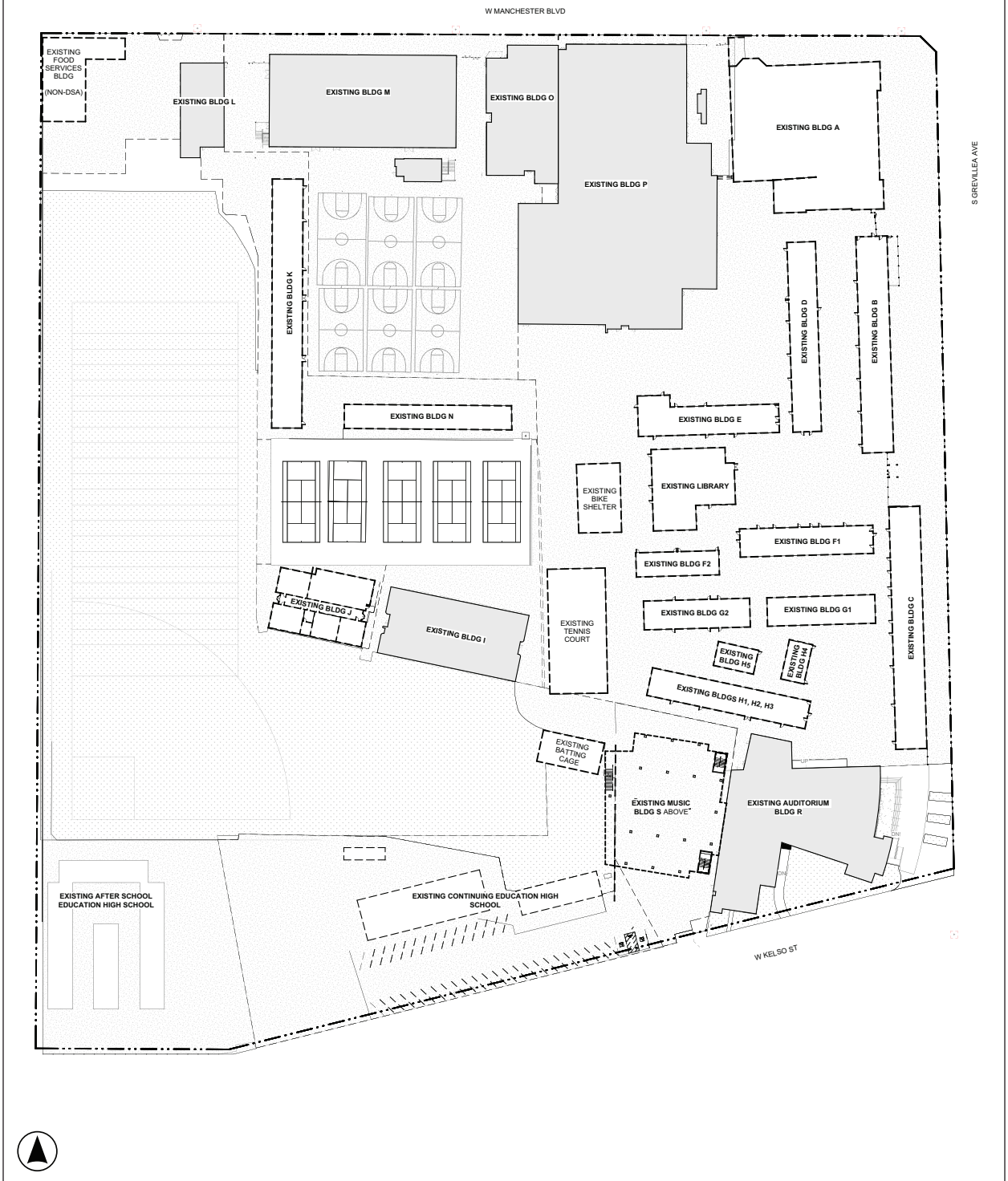
The Inglewood High School campus currently includes 18 classroom buildings (including permanent classroom buildings and portable classroom buildings). In addition to classroom buildings, the Inglewood High School campus includes a fine arts and administration building, an auditorium, locker rooms, library, performing arts building, adult education building, continuing education high school, and home economics building. The existing campus buildings are labeled Buildings A through X as shown on **Figure 3-3**.

Tennis courts, basketball courts, a batting cage, and athletic fields are located west of the majority of the classroom buildings, and extend to the western Project Site boundary. In addition, there are existing tennis courts north of Building I as well as existing basketball courts. Competition sports events occur at other District locations. Covered and uncovered walkways and student seating areas are located between the campus buildings. Landscaping is limited to trees and pockets of grass located around campus.

The Continuing Education High School and After School Education High School buildings are separated from the main campus by fences. These two buildings are located in the southwestern portion of the site along West Kelso Street and have their own parking lot and driveway. While they provide support to the high school they operate separately.

The majority of the Project Site consists of buildings, walkways, and sports fields. The western portion of the Project Site is mostly pervious and contains grasses and vegetation. There is minimal landscaping on the campus. There are 29 trees currently on the campus, which is the primary form of landscaping within the Project Site. The quantity and species of trees that exist on the campus provide limited canopy coverage. The outdoor open space and circulation areas are in some instances cracked and provide accessibility issues. Turf is present throughout several areas on campus, including at the front of the school and at the athletic field. Automatic irrigation is not currently available throughout the site. There are some benches and picnic tables and walls that provide outdoor seating. Monument signs and murals are in various locations throughout the campus.

The Inglewood High School campus currently includes a surface parking lot located west of the Auditorium along the southern edge of the campus along West Kelso Street. Access to the parking lot is via three entrances along West Kelso Street. The parking lot provides 63 total parking spaces, with 61 standard vehicle spaces and 2 ADA accessible spaces. This parking area is currently used by faculty and staff. In addition, there is an existing parking lot south of the Music Building (Building S), which includes 30 total parking spaces. There is no visitor or student parking available on the campus. Bicycle parking is provided in a shelter between the tennis courts and the library.



Source(s): P2S Engineering, 2024

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Figure 3-3
Existing Campus
Inglewood High School Reconstruction

Students arrive at school by car, walk, bike, or use public transportation. School bus service is not provided except for special education students. There is currently no formal loading zone (i.e., curb markings or posted signage) designated; drop-off/pick-up loading activities occur generally along South Grevillea Avenue and West Kelso Street.

After completion of the Project, students from Morningside High School will be transferred to Inglewood High School. With the Morningside High School students being transferred to Inglewood High School, the 1,200 student capacity, for which the school is currently designed, will not be exceeded. The school year runs from late August through early June; summer school sessions also occur on campus. School hours and the associated bell schedule generally is between 8:30 a.m. to 3:15 p.m. Monday through Friday, with the exception that Tuesday end time is 2:20 p.m. In addition, several after-school clubs and organizations have activities on the campus. The campus does not include competition fields for football, softball, baseball or soccer, and these events occur at other District locations.

3.4 General Plan Land Use and Zoning

The General Plan Land Use designation for the Project Site is Downtown Transit Oriented District, which consists principally of the half-mile radius around the Downtown Inglewood Metro Station located near Florence Avenue and Market Street. The Downtown Transit Oriented District allows a variety of mutually complementary uses, including residential, office, retail, government and light industrial/creative office, all in a pedestrian-friendly environment that facilitates transit usage. More specifically, based on the Downtown Transit Oriented District Development Plan and Design Guidelines, the Project Site is located within the Civic Center District. Per the City of Inglewood Planning and Zoning Code (Zoning Code), the Project Site is zoned Civic Center (C-C). The C-C Zoning District allows government offices, schools and other public facilities, as well as limited private office and retail. The Project would be consistent with the land use designation and the zoning.

3.5 Statement of Project Objectives

Section 15124(b) of the CEQA Guidelines states that a project description shall contain “a statement of the objectives sought by the proposed project,” and further states that “the statement of objectives should include the underlying purpose of the project.”

Since the existing campus is aged and in need of upgrades, the underlying purpose of the Project is to provide a modernized and seismically safe Inglewood High School campus, with a combination of new and renovated buildings, new and upgraded recreational areas, and new pathways and gathering spaces throughout campus. As further required by the CEQA Guidelines, the specific objectives of the Project are provided below:

1. Meet the needs of District students through the development of classrooms that are clean, safe, and well-equipped to allow for effective teaching and learning,
2. Reconstruct the existing Inglewood High School campus to provide a modernized campus, as well as a comfortable and safe environment, that benefits both students and staff;
3. Construct new buildings that bring the campus up to code (Educational Code, Building Code, etc.) to provide safety and security, including meeting ADA accessibility requirements and acoustically

protecting classrooms from exterior noise sources, including the nearby Los Angeles International (LAX) airport flight path.

4. Renovate existing buildings to provide a cohesive look throughout the campus.
5. Provide and connect gathering spaces on campus, including provision of shade
6. Provide upgraded sports facilities to accommodate sports practices, school events, and recreational facilities for public use.
7. Integrate the campus into the adjacent urban fabric, to serve as a resource for the community

3.6 Description of Proposed Project

The Project involves the demolition of the existing Administration Building, Music Building, Performing Arts Building, and numerous existing (temporary and permanent) classroom buildings. In addition, the existing Auditorium and Gymnasium, would be internally renovated. Six new buildings would be constructed, including a two-story Administration and General Classroom building; a one-story Food Services and Multi-Purpose Room building; a one- to two-story Science Labs and General Classrooms building; a one-story Student Life building; a two-story Career and Technical Education building; and a one-story CTE and Music classrooms building. Recreational components include the demolition and reconstruction of the basketball and tennis courts, installation of a combination softball/football/soccer artificial turf field at the western edge of campus, and installation of lights to illuminate the courts and fields. The Project would remove existing asphalt areas, and landscaping improvements would be included throughout the Inglewood High School campus.

3.6.1 Project Characteristics

The proposed improvements would occur throughout the Inglewood High School campus. The existing Inglewood High School campus layout and proposed demolition activities are shown on Figure 3-3 and the Inglewood High School proposed components are shown on **Figure 3-4**. As shown in **Table 3-1**, the Project includes the demolition of 23 buildings on the campus (Buildings A, B, C, D, E, F1, F2, G1, G2, H1, H2, H3, H4, H5, I, J, K, L, M, N, the library, music building, and food services building). In addition, hardscape including the existing tennis courts, basketball courts, batting cage, and bike shelter would be demolished. Existing trees (up to 29 trees) and vegetation would be removed during the demolition phase. A discussion of each of the proposed Project characteristics is provided below.

New Buildings

The Project would result in the construction of six new buildings on the Inglewood High School Campus, which would provide a combined total of 177,739 square feet (sf). New buildings would include Administration and General Classrooms (Building 1), Food Services and Multipurpose Room (MPR) (Building 2), Science Labs and General Classrooms (Building 3), Student Life (Building 4), Career and Technical Education and General Classrooms (Building 5), and CTE and Music classrooms (Building 6).

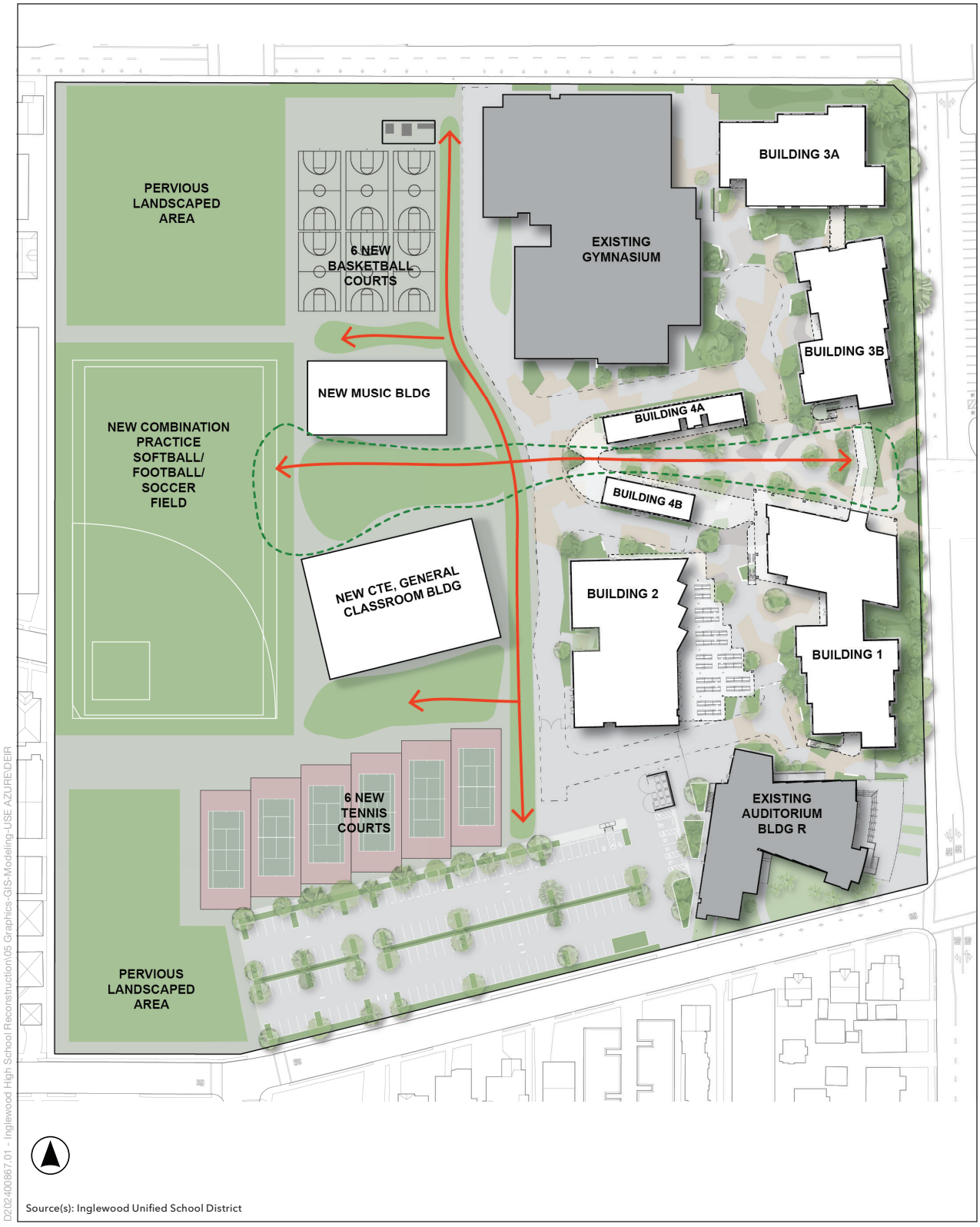
TABLE 3-1
PROJECT CHARACTERISTICS

Building	Use	Status	Existing Area (Sq Ft)	New Area (Sq Ft)	Height (Ft)[1]	Stories
Existing						
A	Fine Arts & Administration	Demolish	48,430	0	36'0"	2
B	General Classrooms	Demolish	7,988	0	14'6"	1
C	Science Classrooms	Demolish	9,802	0	14'6"	1
D	General Classrooms	Demolish	6,198	0	14'6"	1
E	General Classrooms	Demolish	3,391	0	14'6"	1
F	General Classrooms	Demolish	6,580	0	14'6"	1
G	General Classrooms	Demolish	6,587	0	14'6"	1
H	General Classrooms	Demolish	6,456	0	14'6"	1
I*	General Classrooms	Demolish	8,998	0	23'6"	1
J	General Classrooms	Demolish	5,840	0	22'0"	1
K	Home Economics	Demolish	8,400	0	24'0"	1
L*	Band Classrooms	Demolish	3,720	0	20'0"	1
M*	CTE Classrooms	Demolish	24,844	0	28'0"	2
N	General Classrooms	Demolish	3,840	0	11'7"	1
O*	Boys Lockers	Modernize	55,443	55,443	17'10"	1
P	Physical Education & Girls Lockers	Modernize			32'10"	1
Q	Library	Demolish	5,458	0	20'0"	1
R	Auditorium	Modernize	16,449	16,449	37'6"	3
S	Performing Arts	Demolish	16,862	0	34'4"	1
X	Adult Education	No Change	1,282		12'0"	1
	Continuing Education High School	Demolish	7,157	0	11'7"	1
	After School Education Campus	Demolish	9,600	0	11'7"	1
New Construction						
1	Administration & General Classrooms	New	--	48,520	31'6" top of roof (up to 38'0")	2
2	Food Services & MPR	New	--	22,616	13'5" top of roof (up to 31'6")	1
3	Science Labs & General Classrooms	New	--	41,365	28'6" top of roof (up to 35'11")	2
4	Student Life	New	--	9,315	17'11"	1
5	CTE Classrooms & General Classrooms	New	--	20,681	32'0"	2
6	CTE and Music Classrooms	New	--	35,242	28'0"	1

Notes:

1. Single story building heights ranges from 11 feet (ft) – 19 ft.

Source: Practice LA 2025



Source(s): Inglewood Unified School District

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Figure 3-4
Conceptual Site Plan
Inglewood High School Reconstruction

Building 1 (Administration and General Classrooms)

Building 1 would provide approximately 48,520 sf of administration and classroom floor area. The two-story building would be located north of the existing Auditorium, and would be situated along South Grevillea Avenue. The first floor of the building would contain administration space in the northern portion of the building, and classrooms in the southern portion of the first floor and on the entire second floor of the building.

Building 2 (Food Services and MPR)

Building 2 would provide approximately 22,616 sf of food service space and multipurpose uses and would be located in the central portion of the campus. The building would contain a kitchen for food services. The building would provide primarily space for indoor eating, and would include a stage area for smaller performances or meetings. Depending on the style of tables used, the MPR would be able to accommodate between 250-350 students. The new food services building would include a conventional lunch queuing zone and would be directly adjacent to an exterior lunch shelter that covers about 350 seats.

Building 3 (Science Labs and General Classrooms)

Building 3 would provide approximately 41,365 sf of science labs and classroom space. The two-story building would be located on the northeast corner of campus, at the intersection of West Manchester Boulevard and South Grevillea Avenue. Lab classrooms would be located on the first floor of the northern portion of the building and classrooms would be provided on the first floor in the southern portion of the building as well as on the second floor of the building.

Building 4 (Student Life)

Building 4 would be located at the new entrance plaza to prioritize student culture and engagement. The building, which consists of two one-story rectangular components (Buildings 4A and 4B) in a U-shape, would be located north of Building 2 and south of the existing Gymnasium in the central portion of the campus. Building 4 would provide a total of approximately 9,315 sf for student uses. The building would provide space for student life programs such as the Dream Center, Career Center, Junior Reserve Officers' Training Corps, Associated Student Body and Student Store. The building would define a smaller courtyard that may be used for gallery events and smaller gatherings.

Building 5 (Career and Technical Education including general classrooms)

Building 5 would provide approximately 20,681 sf of career and technical and general education space. The two-story building would be located near the center of campus.

Building 6 (Career Technical Education and Music Building)

Building 6 would provide approximately 35,242 sf of classroom space. The one-story, approximately 28-foot-tall building would be located near the center of campus.

Campus Modernization

In addition to the new buildings, the Project includes improvements to modernize the campus. Improvements are proposed for, the Auditorium, Building O (Boys Lockers), and Building P (Physical Education and Girls Lockers), as described in detail below.

The existing façade of Building P would be painted, and the existing mural area at West Manchester Boulevard would remain. Only minimal improvements to resolve old California Division of State Architects (DSA) certification corrections would be made to Buildings O, P and the Auditorium.

Open Space Improvements

The modernization includes improvements to walkways throughout the campus to connect the buildings, landscaping, and seating areas. Other improvements could include, but are not limited to, signage, fencing, drinking fountains, water bottle filling stations, as required by code. A digital marquee would be installed between existing Building P and Building 3 along West Manchester Boulevard.

In the exterior spaces surrounding the existing buildings being renovated, concrete paving areas would be removed to add planting areas with native planting and shade trees. Concrete benches would be placed in these areas to provide small gathering spaces for students throughout the campus.

Utility Improvements

Electrical/Telecommunications

The electrical yard for the school would be located in the northern portion of the Project Site, along West Manchester Boulevard near the existing Southern California Edison (SCE) service. In addition, the Project would include utility and technology retrofits throughout the campus, including electrical rooms in the new buildings. Existing electrical utility connections to the demolished buildings would be removed or capped and plugged.

Electrical and utility features would include fiber optic lines, telecommunications lines, intrusion alarms, public announcement systems, fire alarms, stub conduit boxes, mounted box conduits, underground conduits and pole mounted conduits. Utility work would be coordinated with Southern California Edison (SCE). Fully automatic fire alarm systems with emergency voice/alarm communication systems would be provided in all buildings included in accordance with 2016 California Fire Code (CFC) 907.2.3 and National Fire Protection Association (NFPA) 72.

Water/Sewer

Sewer pipelines, domestic and fire water line systems, which would connect to existing mainlines, would be installed. The Project would also include connections to the existing reclaimed water lines for irrigation use. Expanded utilities services are not planned but, where feasible and based on funding, aging utility infrastructure would be replaced.

Recreational Components

The Project would replace the existing athletic field and would replace the tennis courts and basketball courts (Figure 3-4).

The Project includes some changes that would increase the amount of recreational space. The existing food services building on the northwest corner of the Project Site adjacent to West Manchester Boulevard would be demolished, and the athletic fields would be extended north to the street. The existing athletic field would be removed to include a 380 ft. (length) by 222 ft. (width) combination softball/football/soccer field with synthetic turf. A total of 6 light poles would be installed at the combination softball/football/soccer field. The lights would be approximately 60 to 80 feet in height.

There is a separate existing tennis court located southeast of the five tennis courts. These 6 tennis courts would be demolished and replacement tennis courts would be constructed south of the exiting basketball courts. The new courts would have vinyl coated chain-link fencing with mesh screening, and access gates with lockable latches. The tennis courts would be relocated from the current central portion of campus closer to the south of campus and the existing parking lot, as shown in the site plan (Figure 3-4). The tennis courts would include new lighting consisting of 8 light poles at 50ft-60ft tall. The existing basketball courts would be demolished, and new basketball courts would be constructed in the northern central portion of the site, just west of the existing gymnasium. Four light poles at 30 feet tall would be constructed at the new basketball courts.

In addition, the Project would result in the demolition of the existing batting cage, which is located west of the Music Building (Building X).

Access, Parking, and Circulation

As shown on Figure 3-3, vehicular access to Inglewood High School campus is currently provided by two driveways along West Manchester Boulevard and three driveways along West Kelso Street. As previously discussed, the Project Site currently includes a surface parking lot, which is located along West Kelso Street in the southern portion of the campus. Parking lot and internal circulation improvements are described below.

Parking

The Project would result in an increase in the number of total parking spaces (both accessible and non-accessible) from 93 to 158. The Project would include 128 standard stalls, 25 electric vehicle (EV) stalls (including 6 stalls with charging stations), four standard ADA stalls (including one EV), and three van ADA stalls (including one EV). New landscaping would be added within the parking lot. The Project would also provide 32 bicycle parking spaces near the campus entrance, located south of Building 3, and eight covered staff bicycle parking spaces in a lockable enclosure within Building 1.

Fire Lane Improvements

Internal vehicular circulation would be limited to emergency vehicles and would be provided via an extension of the existing fire lane, which would continue to be accessed from West Manchester Boulevard. The fire lane would go through the center of campus and would continue through the parking lot to a driveway along West Kelso Street. The proposed fire lane improvements would comply with State standards and be reviewed by the City Fire Department.

Pedestrian Improvements

A new pedestrian entrance would be created on South Grevillea Avenue at the intersection with Nutwood Street leading into the campus, which is the historic location of the main campus entry. Accessible pedestrian pathways would be installed throughout the campus to provide links to the buildings and pedestrian access points from the adjacent streets. Additionally, the City of Inglewood and the District have begun preliminary discussions to provide a pedestrian bridge from the high school campus corner to Inglewood Public library over West Manchester Boulevard, which would provide the students access to the public library as a campus resource.

Lighting and Sound

The Project Site is located within the Outdoor Lighting Zone designation of LZ-03 for Moderately High-Urban Areas per Title 24 CCR Part 1 Section 10.114. The Project would include campus path lighting and exterior building lights. A total of 16 new Musco lights would be placed at the sports facilities, as noted above. These lights would support existing joint use activities, where fields and outdoor sports facilities are available for rental. These lights would be down-shielded to minimize light spill-over and would be directed downward towards the individual facilities.

The school's amplified sound system would allow for announcements to be heard as necessary throughout the Project Site. Sound would also be used during campus activities. All outdoor sound would be in compliance with the City's noise ordinance.

3.6.2 Landscaping Plan

The landscaping improvements included as part of the Project would consist of the installation of drought tolerant, low maintenance plants throughout the campus. In addition to the four student quads and landscaping outside of existing buildings, landscaping would be added to the perimeter of the campus and within the new parking lot. Landscape planters would be provided adjacent to the perimeter fence at most areas, which would soften the campus perimeter and provide screening. At the main entry, bermed landscape would limit the outside views, and would provide privacy from inside the campus. Low-impact development planters would be incorporated as needed to control stormwater runoff from adjacent buildings and walkways. Planting areas would also be added along West Manchester Avenue to provide green edges along this major street corridor.

All existing irrigation would be removed and replaced with a water-efficient irrigation system with a smart weather-based controller. All landscaping would be designed to use recycled water for irrigation.

3.6.3 Grading, Earthwork, Demolition, and Drainage

Construction would involve demolition of existing paving, buildings, and recreational uses; site clearing; grading and excavation for the proposed buildings; utility, circulation, and landscaping improvements, structural development; and site cleanup. Construction of the Project would result in approximately 537,600 sf of impervious surfaces and approximately 182,400 sf of pervious surfaces across the Project Site. The Project would require a maximum excavation depth of 11.5 feet and would be anticipated to include soil cut and fill, likely resulting in soil export. Additionally, the Project would result in demolition

debris, resulting from demolition of buildings, batting cage and tennis courts, basketball courts, parking lots, and concrete walkways.

Drainage improvements would be included for all recreational components and exterior finished grades or surfaces would all be designed with positive drainage away from foundations. Ground surfaces and paved surfaces within 10 feet of building foundations would be sloped between 0.5 to 5 percent to meet Americans with Disabilities Act (ADA) requirements while also providing adequate slopes for drainage. Planters would have adequate surface drainage to present standing water adjacent to foundations. Additional catch basins, storm drains, and landscape drains would be installed throughout the Project Site to ensure adequate site drainage. In addition, the following erosion and sediment control measures would be implemented during construction:

- All inlets receiving stormwater runoff from the Project Site shall be equipped with inlet protection.
- All paved areas shall be kept clear of earth materials and debris and the Project Site shall be maintained so to minimize sediment laden runoff entering the storm drain system.
- Stockpiled earthen material shall be either covered with a tarp or watered sufficiently to eliminate dust.
- 6-foot-tall dust fences shall be installed around the Project Site during construction activities.
- Fiber rolls and/or gravel bags shall be utilized to stabilize soils and prevent erosion.
- Regraded dirt shall be stabilized against erosion through hydroseeding, anchored geotextile fabric, or equivalent measure.

3.6.4 Sustainable Design Features

Per the California Energy Code Section 110.10B, the Project is required to provide at least 15 percent of the total roof area. The Project would meet this requirement and would provide the required coverage of solar ready area on building rooftops. As discussed above, the proposed parking improvements also include 25 electric vehicle parking spaces. Irrigation improvements included in the Project would use reclaimed water and check valves or anti-drain valves are required on all sprinkler heads where low point drainage could occur as part of the model water efficient landscape ordinance requirements. 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.

3.7 Construction Process and Timeline

Construction would occur in multiple phases with site preparation and demolition anticipated to begin January 2026 through October 2027, with occupancy in January 2028. As indicated above, Inglewood High School students and faculty would be relocated to the Morningside High School during the reconstruction of the campus. Abatement work is conducted regularly throughout the campus, and would occur in compliance with existing regulations and standards.

The various phases of construction would consist of demolition of existing buildings, rough grading of the site, construction of new buildings, and modernization of the existing buildings. Total construction would occur for a duration of 22 months with a 5-day work week. If construction takes longer than assumed, work could occur beyond the anticipated duration.

Construction is expected to occur between 7:00 a.m. and 8:00 p.m., Monday through Saturday, and would comply with the City of Inglewood Municipal Code limits regarding construction activity (Municipal Code Section 5-41). Nighttime construction activities would occur in compliance with the City's Municipal Code, which requires issuance of a permit for construction equipment operated outside the hours of 7:00 a.m. – 8:00 p.m. or for work on weekends.

All construction and work areas would be clearly demarcated and student access would be prohibited, consistent with construction efforts on other District facilities. All construction equipment staging would be located on-site in clearly demarcated areas. During construction, materials and equipment may be visible from adjacent streets, however, the District would screen these areas with construction fencing. Construction workers would park on the Project Site in specially designated areas. Construction of the Project may require detours and temporary lane closures along streets bordering the Project Site. A Construction Management Plan would be prepared if required by the City.

3.8 Discretionary Approvals Required

3.8.1 Lead Agency

In conformance with CEQA Guideline Sections 15050 and 15367, the District is the Lead Agency, which is defined as the "public agency, which has the principal responsibility for carrying out or approving a project."

3.8.2 Reviewing Agencies

There are no responsible or trustee agencies. DSA will review and approve the project design for compliance with California Code of Regulations Title 24 and access compliance requirements.

3.8.3 Permits and Other Approvals

Actions and approvals that may be required from other agencies for the Proposed Project include:

- DSA –Project closeout and certification will be required during each construction phase
- State Water Resources Board - Construction General Permit coverage
- Los Angeles Regional Water Quality Control Board –National Pollutant Discharge Elimination System (NPDES) Permit coverage and review/approval Stormwater Pollution Prevention Plan (SWPPP)
- City of Inglewood Department of Public Works – Permit for construction noise if construction activities are required outside of the hours identified in the City's Municipal Code

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CHAPTER 4
Environmental Effects of the Project

4.0 Environmental Impacts Analysis

4.0.1 Introduction

The focus of Chapter 4 is on the potential impacts that could occur as a result of the Project. The sections included are those that have the potential to result in significant adverse impacts to the physical environment. The following sections are included in this chapter:

- Aesthetics – Lighting (Section 4.1)
- Air Quality (Section 4.2)
- Cultural Resources (Section 4.3)
- Energy (Section 4.4)
- Geology and Soils – Paleontological Resources (Section 4.5)
- Greenhouse Gas Emissions (Section 4.6)
- Noise (Section 4.7)
- Transportation (Section 4.8)
- Tribal Cultural Resources (Section 4.9)

Based on the Initial Study, which is contained in Appendix A-2 of this EIR and public comments received during the NOP circulation period, it was determined that several issue areas would not be subject to significant impacts due to implementation of the Project. Generally, these issue areas include Aesthetics (all except Lighting), Agricultural and Forestry Resources, Biological Resources, Geology and Soils (all except Paleontological Resources), Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use, Mineral Resources, Population and Housing, Public Services, Utilities and Service Systems, and Wildfire. Please see Section 5.5, *Effects Found Not to be Significant*, of Chapter 5, *Other CEQA Considerations,* of this Draft EIR for a discussion of those issue areas for which a detailed analysis is not included and the basis for those determinations.

4.0.2 Environmental Impact

Each section in this chapter addresses a specific environmental issue area as listed above and includes the following components:

- **Existing Setting:** This subsection describes the physical characteristics and existing environmental conditions within and in the vicinity of the Project area.
- **Regulatory Setting:** This subsection presents information on the laws, regulations, plans, and policies that relate to the issue area being discussed. Regulations originating from federal, State, regional, and local levels are discussed as appropriate.
- **Methodology:** This subsection provides a description of the methodology used for the analysis of the environmental issue addressed in the section.
- **Thresholds of Significance:** This subsection presents the criteria established by the Lead Agency to identify at what level an impact would be considered significant and require implementation of mitigation measures.
- **Analysis of Project Impacts:** This subsection provides an analysis of the nature and extent of potential Project impacts. These analyses address direct (or primary) effects of the Project as well as the indirect (or secondary) impacts. This subsection also provides any mitigation measures used to reduce or eliminate Project impacts that have been determined significant based on the established thresholds of significance.
- **Cumulative Impacts:** A discussion of the effects of the Project when combined with the effects of related projects, which include other past, present and future probable projects is provided. The approach to addressing cumulative impacts, including a list of related projects, is described in Chapter 3, *Environmental Setting*, of this Draft EIR.
- **Mitigation Measures:** This subsection provides mitigation measures, if necessary, to reduce significant impacts identified in the analysis of the Project.
- **Level of Significance after Mitigation:** A discussion of the significance of each impact after mitigation is provided.

4.0.3 Terminology Used in This EIR

In evaluating the impacts of the Project, the impact is determined by applying the evaluation criteria, or threshold of significance, presented for each resource area. The following terms are used to describe the effect:

- **Threshold of significance:** A threshold of significance is a criterion applied by the Lead Agency to identify significant adverse environmental impacts. A threshold is defined by a Lead Agency based on guidance found in CEQA or the CEQA Guidelines, scientific and factual data relative to the Lead Agency jurisdiction, views of the public in affected areas, the policy/regulatory environment of affected jurisdictions, and other factors.
- **Less than significant impact:** A less than significant impact does not result in a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or

aesthetic significance (see CEQA Guidelines Section 15382). Impacts determined to be less than significant do not require mitigation measures.

- **Significant impact:** Public Resources Code (PRC) Section 21068 defines a significant impact as "a substantial, or potentially substantial, adverse change in the environment." The environmental checklist included as Appendix G of the CEQA Guidelines provides additional guidance for determining which impacts would be regarded as significant. This EIR applies the thresholds contained within Appendix G and identified in each section's "Thresholds of Significance," and uses the CEQA definition of "significant impact." Feasible mitigation measures or alternatives to the Project must be identified and adopted if they would avoid or substantially reduce the significant impact.
- **Significant and unavoidable impact:** A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the District would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the District considered in approving the project notwithstanding the potential for significant environmental impacts.

Mitigation measures are measures identified to avoid or reduce a significant impact that has been identified through environmental analysis. Mitigation measures generally include provisions for:

- Avoiding the impact by not taking a certain action or parts of an action;
- Minimizing the impact by limiting the degree or magnitude of the action and its implementation;
- Rectifying the impact by repairing, rehabilitating or restoring the affected environment;
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and
- Compensating for the effect by replacing or providing substitute resources or environments.

Mitigation measures will be adopted as part of the MMRP so that their implementation can be tracked by the District to ensure compliance.

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4.1 Aesthetics – Lighting

4.1.1 Introduction

This section provides an assessment of potential impacts aesthetic resources, specifically, lighting impacts that could result from the implementation of the Project. The Project proposes the installation of a digital marquee along Manchester Boulevard, installation of a combination softball/football/soccer artificial turf field at the western edge of campus, and installation of lights to illuminate the courts and fields which is the subject of this analysis. The analysis in this section is based on Project plans, the *Photometric Plans for the* prepared by Musco Sports Lighting, LLC., dated August 20, 2025 (Appendix B1) as well as a lighting spillover exhibit prepared for the basketball court lights (Appendix B2).

4.1.2 Environmental Setting

Regulatory Framework

State

California Building Code: Building Energy Efficiency Standards

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission [CEC]) in June 1977 (Title 24, Part 6, of the California Code of Regulations [CCR]). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The CEC adopted the 2019 Building Energy Efficiency Standards, which went into effect on January 1, 2020. Title 24 requires outdoor lighting controls to reduce energy usage, which in effect reduces outdoor lighting.

Nighttime Sky, CCR Title 24, Outdoor Lighting Standards

The California legislature passed a bill in 2001 requiring the CEC to adopt energy efficiency standards for outdoor lighting, both public and private. In November 2003, the Commission adopted changes to the 24 CCR, Parts 1 and 6, Building Energy Efficiency Standards. These standards became effective on October 1, 2005, and included changes to the requirements for outdoor lighting for residential and nonresidential development. These standards improved the quality of outdoor lighting and helped to reduce the impacts of light pollution, light trespass, and glare. The standards regulate lighting characteristics such as maximum power and brightness, shielding, and sensor controls to turn lighting on and off. Different lighting standards are set for different “lighting zones” (LZ), and the zone for a specific area is based on population figures from the 2000 Census. Areas can be designated LZ1 (dark), LZ2 (rural), or LZ3 (urban). Based on this classification, the project site is designated LZ3.

Model Lighting Ordinance

In 2011, the IDA and the IES developed a Model Lighting Ordinance (MLO) and an accompanying User’s Guide to address the need for regulation of outdoor lighting in North America (IDA-IES 2011). As noted by the IDA (2023), the MLO has not been widely adopted by jurisdictions across the U.S. (and it has not been adopted by Los Angeles County); however, it does provide a framework that can be used for

lighting designs and analyses. The MLO was developed to provide suggested regulations for outdoor lighting to:

a. Permit the use of outdoor lighting that does not exceed the minimum levels specified in IES recommended practices for night-time safety, utility, security, productivity, enjoyment, and commerce.

b. Minimize adverse offsite impacts of lighting such as light trespass, and obtrusive light.

c. Curtail light pollution, reduce skyglow and improve the nighttime environment for astronomy.

d. Help protect the natural environment from the adverse effects of night lighting from gas or electric sources.

e. Conserve energy and resources to the greatest extent possible.

The MLO defines lighting zones, and provides methods for calculation of outdoor lighting for residential, non-residential, and outdoor sports field projects. The MLO contains suggested standards for luminaire [1] lumens[2] in each lighting zone based on the proposed land use. The MLO also contains suggested maximum allowable Backlight, Uplight, and Glare (BUG) Ratings to be calculated based on the lighting zone and the proposed land use.

Local

City of Inglewood General Plan

The City's General Plan does not contain any goals or policies regarding lighting or glare.

City Municipal Code

The City's Municipal Code does not provide specific guidance for development guidelines or regulations regarding lighting, especially as it relates to lighting on private property, or field lighting. However, Section 12-38.79.1 provides the following guidance regarding sign illumination that will be used as a frame of reference for the following analysis:

> (6) … The maximum brightness level for signage and lighting on the project shall not result in more measured in four hundred candelas/m^2. The light sources from any lighting on the project shall not result in more than two foot-candles of lighting intensity at the property line of any residential use. Compliance with the two foot-candle standard shall be tested following the installation of the proposed signage and prior to the issuance of finalized building permits or operation of the sign.
>
> In addition, Section 12-22.39 provides the following guidance regarding lighting for the Medical Enterprise Overlay Zone that will be used as a frame of reference for the following analysis:
>
> (2)… Lighting for the Medical Enterprise Overlay Zone shall meet the following foot-candle illumination level objective Provide one foot-candle in parking lots, near nighttime

[1] A luminaire is a complete lighting source: the light unit itself and all the components directly associated with the distribution, positioning, and protection of the light unit.

[2] Lumens are a measure of the total quantity of visible light emitted by a light source. For LED lighting, the amount of lumens indicates the "brightness" of a light; more lumens results in a brighter light.

building entries, bus/van pick up locations, and outdoor seating areas and one-half foot-candle on walkways and pedestrian paths.

Existing Conditions

Visual Character

The Project Site is fully developed and is currently occupied by Inglewood High School. The primary campus development is situated in the eastern portion of campus, and consists of classroom and administrative buildings. Athletic courts and fields are located on the western portion of the campus. There is a surface parking lot west of the Auditorium, along the southern edge of the campus. The site is bounded by residential properties to the west, South Grevillea Avenue to the east, West Kelso Street to the south, and West Manchester Avenue to the north. Manchester Avenue, also known as State Route 42, is within the Caltrans Right of Way.

Ambient Lighting

The Project Site is located within the Outdoor Lighting Zone designation of LZ-03 for Moderately High-Urban Areas per Title 24 CCR Part 1 Section 10.114 of the California Code of Regulations. This designation helps establish requirements for outdoor lighting on the project site to ensure energy efficiency and minimize light pollution. LZ-03 is characterized by "moderately high" ambient light levels from existing surrounding development. It is typically found in urban areas and can encompass various building types, such as high intensity commercial corridors, entertainment centers, and heavy industrial or manufacturing zone districts.

The Project Site and its immediate vicinity contain existing sources of light and illumination. There are no field lights currently installed at the Project Site. Off-site and campus existing sources of light consist of street lighting, exterior lighting, parking lot lighting, lighting around the athletic courts, and security lighting.

Sensitive Receptors

The Project Site is located in an urbanized setting characterized by streetlights, stoplights, and architectural lighting, surface parking lot lights, vehicle lights and interior building lighting from the high school. The existing commercial uses, government facilities, and adjacent single family residential uses immediately adjacent to the Site generate relatively low ambient light because of the absence of retail signage and other illuminated signs. However, cumulatively, ambient lighting is considered moderately high, as noted by the LZ-03 designation mentioned above.

Sensitive receptors are areas where people or populations are particularly susceptible to the adverse effects of environmental impacts, such as air pollution, noise, or other hazards. These receptors are often characterized by the presence of vulnerable groups like children, the elderly, or individuals with pre-existing health conditions. Residential uses are located immediately across W. Kelso Street south of the Project Site's existing parking lot and adjacent to the fields southwest of the Site. The Westchester Villa Retirement residential building is also located immediate adjacent to the existing fields west of the Project Site. Other educational facilities are also within proximity to the Project Site, including Canterbury Academy to the east, and Inglewood Avenue Preschool Academy, Hudnall Elementary School, and

Inglewood Child Development to the west, however, are approximately 100 feet away. Centinela Hospital Medical Center is located approximately 1 mile to the southeast of the Project Site.

4.1.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to Aesthetics if it would:

- **Threshold VIS-1:** Have a substantial adverse effect on a scenic vista?
- **Threshold VIS-2:** Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- **Threshold VIS-3:** In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
- **Threshold VIS-4:** Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The District determined in the Initial Study completed for the Project (see Appendix A) that the following environmental issue areas would result in less than significant impacts and therefore do not warrant further discussion in the EIR.

- Have a substantial adverse effect on a scenic vista
- Substantially damage scenic resources within a designated scenic highway
- In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings

As detailed in the Initial Study completed for the Project (see Appendix A), the Project Site is not within the viewshed of a scenic vista, is not within the immediate vicinity of designated scenic highways, and would not conflict with applicable zoning and other regulations governing scenic quality.

Methodology

The analysis of impacts to visual resources is based on threshold VIS-4 only as the Project has screened out potential impacts related to thresholds VIS-1 through VIS-3 in the Initial Study prepared for the Project. The Project would assess the potential lighting and glare impacts imposed by the proposed recreational field lighting. For glare impacts, the analysis would assess existing sources of glare, locations of sensitive receptors, and potential sources of glare from the proposed Project that may result in impacts.

Lighting impacts would be assessed in the context of visual changes to the existing environment, the extent and duration of potential lighting impacts on sensitive receptors, and project design measures that would be undertaken that would reduce potential impacts. Foot-candle (fc) is a unit based on English measurements. Although foot-candles are considered obsolete in some scientific circles, they are

nevertheless used because many existing light meters are calibrated in footcandles. Moonlight produces approximately 0.01 fc, and sunlight can produce up to 10,000 fc. Based on standard practice and thresholds identified in other cities, light spillover from field lighting should not exceed 5-foot candles at the property line of neighboring properties to eliminate nuisance glare and lighting.

It should be noted that an assessment of visual character is inherently a subjective matter, and reasonable people can disagree as to whether changes in visual character would be adverse or beneficial.

Project Design Features

There are no Project Design Features associated with aesthetic resources.

Analysis of Project Impacts

Threshold VIS-4: The Project would have a potentially significant impact on transportation if it would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Impact Analysis

Construction

Construction activities would occur from early 2026 over a duration of approximately 22 months. Nighttime work is not expected but could occur if needed and with approval as necessary. Temporary lighting sources required for nighttime construction activities may result in sources of light for adjacent residences and result in a source of glare to motorists on adjacent roadways. However, these impacts would be intermittent and temporary, as construction is prohibited during the hours of 8 p.m. and 7 a.m of the next day per Municipal Code Section 5-41 due to noise regulations. Therefore, there would be less than significant impacts related to light and glare from construction.

Operations

Existing sources of lighting on the Project Site and from the surrounding area include security lighting from exterior lights, indoor home lights emanating from windows, streetlights, parking lights, and vehicle headlights. Glare can occur when a light source reflects off a reflective/light-colored surface. Existing sources of glare include light reflecting off of vehicles traveling on the public rights-of-way, parked in parking lots and along public rights-of-way, and light-colored building materials. Security lighting was assumed to be installed on accessory structures, but per design regulations, would be required to be shielded and pointed downwards. In addition, light from automobiles entering and exiting the onsite parking areas already occur in the existing condition and would not represent a significant change in the post-Project condition to cause nighttime lighting impacts. Direct glare is caused by looking at an unshielded lamp or a light at maximum candlepower. Lighting may be visible from the adjacent properties, but all athletic area lighting and exterior lighting would be shielded and pointed downward, and direct glare would not be generated in a way that would substantially affect views adversely from direct glare.

As noted in the Project Description, a digital marquee would be installed between existing Building P and Building 3 along West Manchester Boulevard, which will replace an existing marquee at the corner of

West Manchester Boulevard and South Grevillea Avenue. The replacement marquee will be internally illuminated, so will comply with Section 12-76(G) of Inglewood's zoning code.

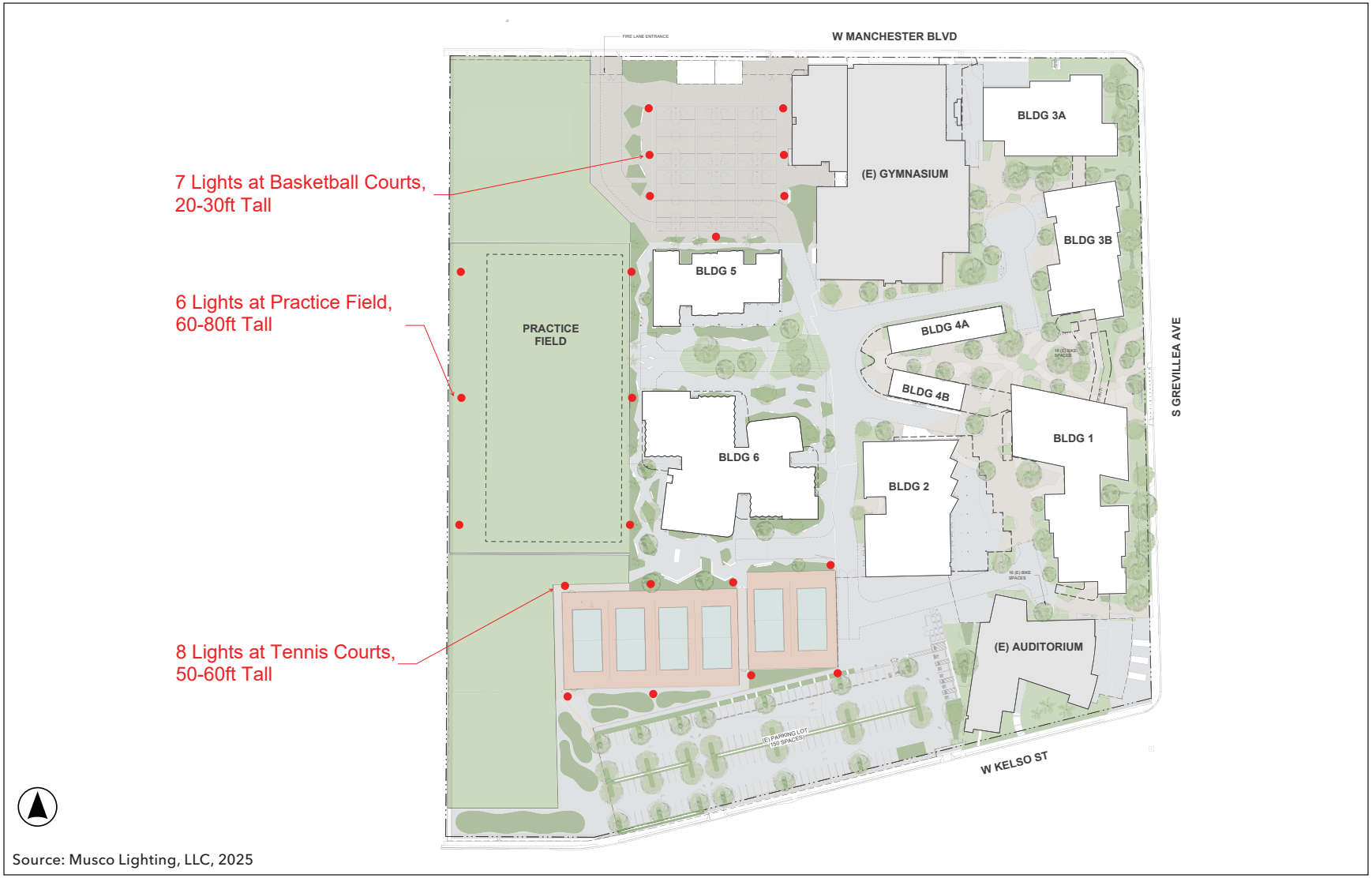
In addition, the Project proposes lighting at the combination softball/football/soccer field, at the basketball courts, at the tennis courts, and in the parking lot, in addition to shielded exterior lighting for buildings. The Project proposes 21 light poles for the athletic areas which will include 6 poles at the combination field that extend to a maximum height of 80 feet above grade, 7 light poles at the basketball courts that extend to a maximum height of 30 feet above grade, and 8 light poles at the tennis courts that extend to a maximum height of 60 feet above grade.

A photometric study was prepared for the Project's proposed lighting at the athletic areas (Appendix B1). In addition, Figure 4.1-1 shows the distribution of the new lighting proposed for the combination field and sports courts.

It is noted that lighting systems would not result in daytime light impacts because the light sources would be turned off during the day. Lighting would primarily be used between the hours of dusk and evening, with slight variations in time depending on the seasons. As the athletic facilities and parking lot would be utilized for school sport practices and for public recreational use through reservations, lighting would be utilized year-round. As residences are located immediately adjacent to the field to the west, there is a potential for field lighting to impact adjacent residents west of the athletic fields. Light levels would continue to decrease as the distance increases from the light source.

The proximity of the proposed lights to the residential areas presents the potential for light spillover and glare. As shown in Figure 4.1-2, *Combination Field Light Spillover*, the range of vertical and horizontal spillover of light onto adjacent properties from the softball/football/soccer field poleswould be approximately 0.1 to 0.5 fc. These spillover foodcandle levels were measured at points 10ft west of the site's property line, which is the approximate location of the existing adjacent properties' easternmost exterior walls. As noted in the figure, these levels were not affected by the shadow cast by the 7'-6" tall existing CMU site wall along the site's west property line. Vertical spillover refers to light that falls outside the area intended to be lit, typically measured in the vertical plane with the light meter oriented towards the light source. Horizontal spillover refers to the amount of light received on a horizontal surface, such as a roadway or parking lot pavement. The 3 light poles along the west edge of the field adjacent to the off-site properties (residences) would have a maximum spillover of 0.5 fc of light spillover, with the highest areas of spillover being directly adjacent to the three light poles. Despite this level of spillover, it is noted that the poles were moved inwards toward the center of the field to reduce light spillover onto sensitive receptors. In addition, the LED luminaires would be down-shielded to avoid light spill-over on the adjacent sensitive uses and public right of way and would be directed downward towards the individual facilities.

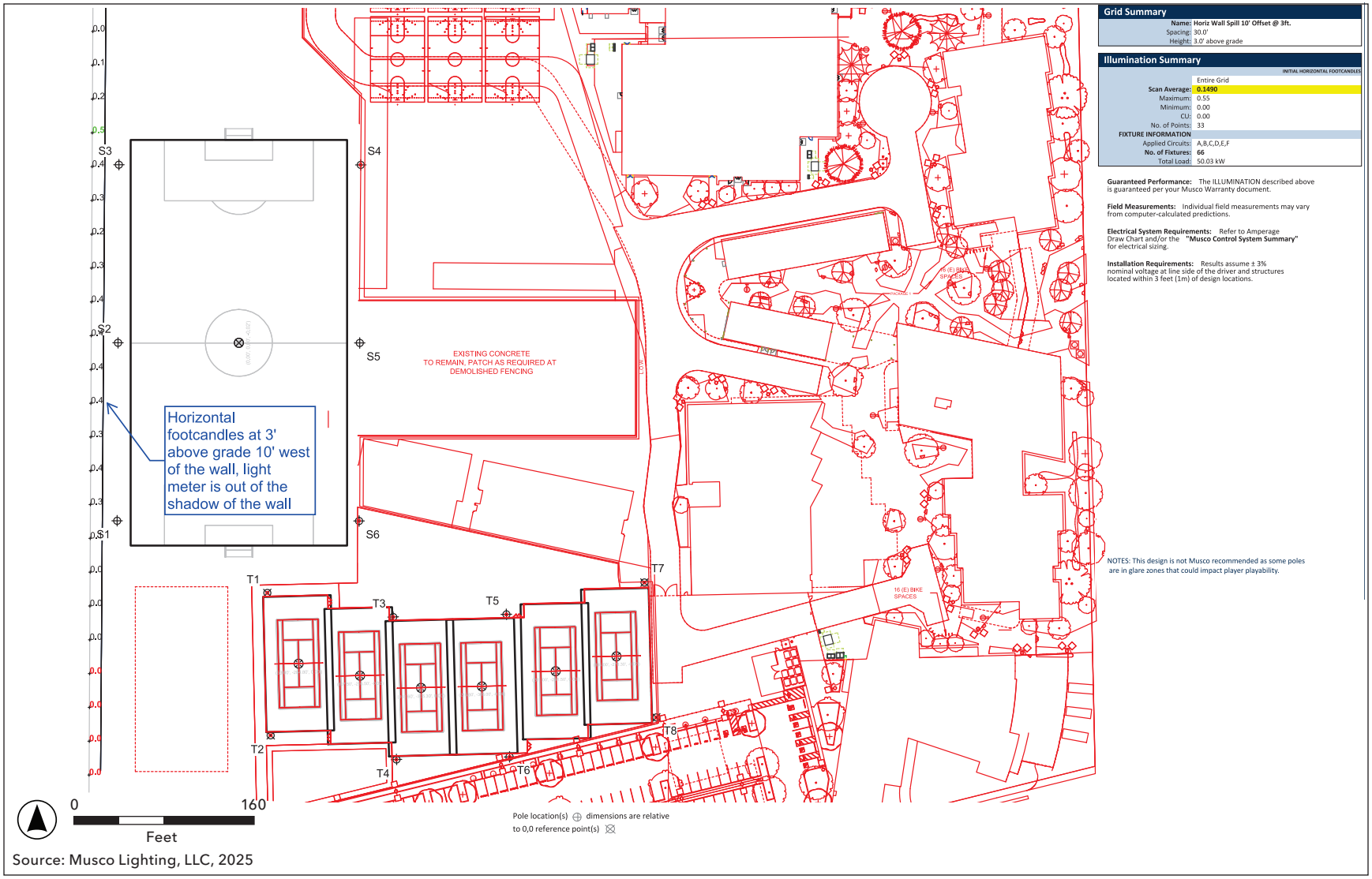
The basketball court lights will be lower in height than the Musco combination field lights, and, as shown in Appendix Figure 4.1-3, *Basketball Court Light Spillover*, spillover at the Manchester Boulevard property line would be at or below 0.5cs. In addition, the basketball court lights are further from any sensitive receptors, as uses across Manchester Boulevard consist of commercial and City-serving uses including the library and City Hall.



Source: Musco Lighting, LLC, 2025

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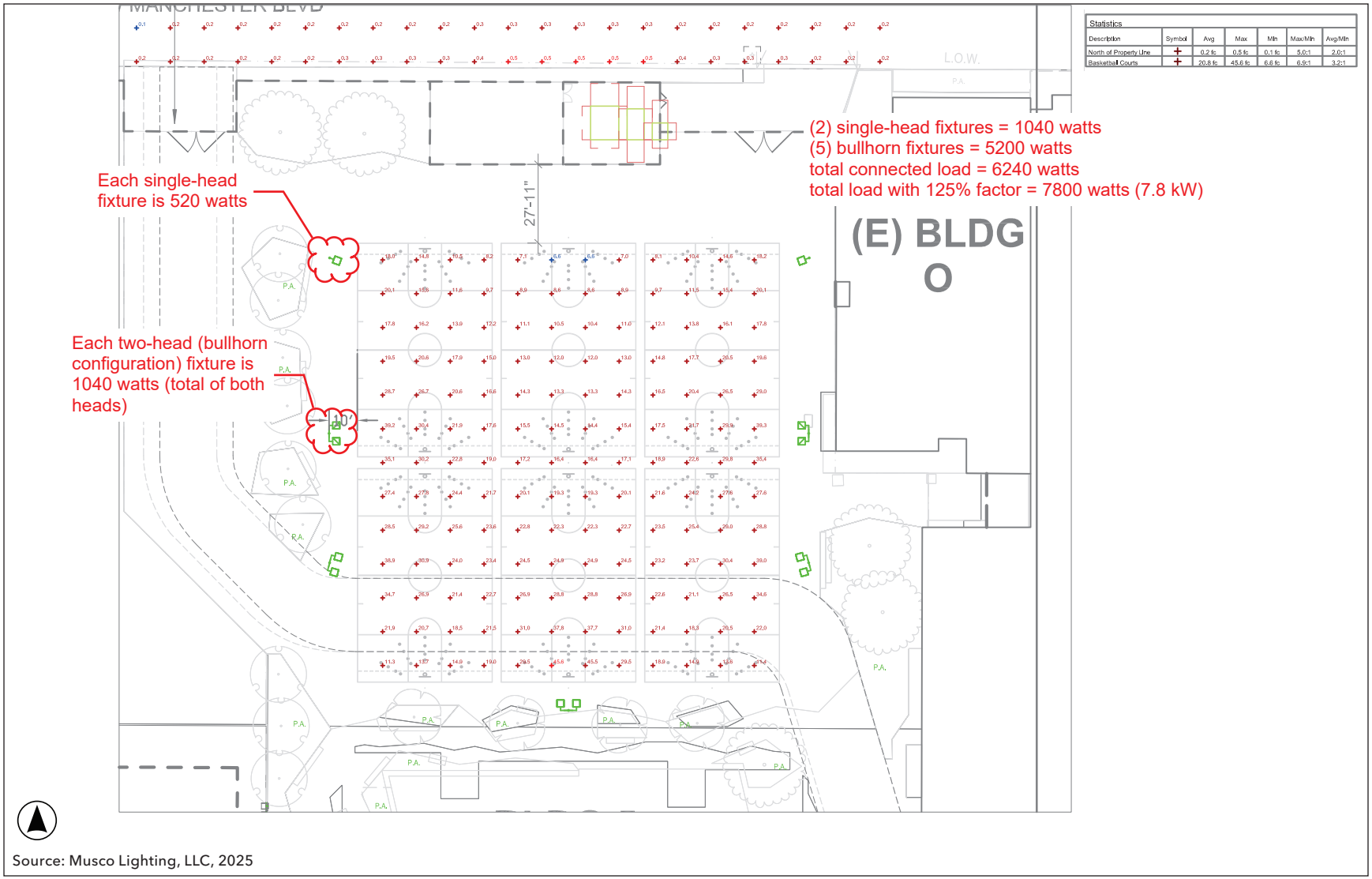
Figure 4.1-1
New Sports Light Pole Locations
Inglewood High School Reconstruction



Source: Musco Lighting, LLC, 2025

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Figure 4.1-2
Combination Field Light Spillover
Inglewood High School Reconstruction



Source: Musco Lighting, LLC, 2025

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Figure 4.1-3
Basketball Court Light Spillover
Inglewood High School Reconstruction

Based on the generally accepted spillover threshold of 0.5 fc, the Project would be at or under the threshold.

Based on the methodology established for this analysis, the Project would generate a new source of substantial light that could adversely affect day or nighttime views in the area. However, with implementation of mitigation measure MM-AES-1, the duration of the lighting impacts would be restricted, so as not to disturb sensitive receptors beyond a specific time.

Mitigation Measures

The implementation of Mitigation Measure MM-AES-1 presented below address the potential for impacts on sensitive receptors during nighttime lighting for the Project.

> **MM-AES-1** Inglewood Unified School District shall program the lighting control system to restrict any activities to no later than 10:00 pm.

Level of Significance after Mitigation

With implementation of mitigation impacts from the Project adversely impacting day or nighttime views from new sources of substantial light or glare would be less than significant.

Cumulative Impacts

Impact Analysis

Implementation of cumulative projects would increase lighting in the Project vicinity and increase the potential for lighting and glare impacts. Although cumulative impacts have the potential to be significant within the City, potential lighting impacts within the City would be less than significant when the City's Zoning Code requirements related to outdoor lighting are implemented by each cumulative project. In addition, the City also currently regulates the use of reflective building materials, and future development in the area has a potential to result in less than significant cumulative glare impacts with implementation of these requirements. Therefore, the Project's contribution to cumulative glare impacts would be less than cumulatively considerable.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance after Mitigation

Not applicable. Cumulative impacts related to lighting and glare would be less than significant.

4.2 Air Quality

4.2.1 Introduction

This section evaluates the Project's potential air quality impacts, including potential cumulative impacts generated by construction and operation of the Project. This section estimates the air pollutant emissions generated by Project construction and operation and assesses whether Project emissions would conflict with or obstruct implementation of the air quality policies set forth within the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP); result in a cumulatively considerable net increase of any criteria pollutant in non-attainment of federal or State ambient air quality standard; or, expose sensitive receptors to substantial pollutant concentrations. This section relies on the information, data, assumptions, calculation worksheets, and model outputs are provided in Appendix C of this Draft EIR.

4.2.2 Environmental Setting

Air Quality Background

Air Quality and Public Health

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of an overall endeavor to prevent further deterioration and to facilitate improvement in air quality. The National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) have been set at levels considered safe to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly with a margin of safety, and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.[1] As the scientific methods for the study of air pollution health effects have progressed over the past decades, adverse effects have been shown to occur at lower levels of exposure. For some pollutants, no clear thresholds for effects have been demonstrated. New findings over time have, in turn, led to the revision and lowering of NAAQS which, in the judgment of the U.S. Environmental Protection Agency (USEPA), are necessary to protect public health. Ongoing assessments of the scientific evidence from health studies continue to be an important part of setting and informing revisions to federal and state air quality standards.[2] The NAAQS and CAAQS are listed in Table 4.2-1 in the *Regulatory Framework* subsection.

At the regional level, the SCAQMD is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange County, Riverside and San Bernardino Counties, including the Coachella Valley.[3] Inglewood is located within the South Coast Air Basin (Air Basin) which is a distinct geographic subarea within the SCAQMD's jurisdiction. The SCAQMD, together with the Southern California Association of Governments (SCAG), has the responsibility for ensuring that national and State ambient air quality standards are achieved and maintained for the Air Basin. Failure to comply with

1 USEPA, NAAQS Table, https://www.epa.gov/criteria-air-pollutants/naaqs-table. Accessed April 2025.

2 South Coast Air Quality Management District (SCAQMD), 2022 Air Quality Management Plan, 2022. Appendix I-154.

3 SCAQMD, Map of Jurisdiction, 1999.

these standards puts State and local agencies at risk for penalties in the form of lawsuits, fines, a federal takeover of state implementation plans, and a loss of funds from federal agencies such as the Federal Highway Administration and Federal Transit Administration.

To meet the air quality standards, regional plans are developed, including the SCAQMD's AQMP, which incorporates regional demographic projections and integrated regional land use and transportation strategies from SCAG's 2024-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), known as Connect SoCal 2024. These plans work together to examine multiple pollutants, cumulative effects, and transport issues related to attaining healthful air quality in the region. In addition, a host of regulatory standards at the federal, State, regional, and local level function to identify and limit exposure of air pollutants and toxic air contaminants (TACs).

Local Air Quality and Air Pollution Sources

As mentioned previously, Inglewood is located in the South Coast Air Basin, which is an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and San Diego County to the south. The Air Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the Coachella Valley area in Riverside County. The regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Air Basin is primarily influenced by meteorology and a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry.

The Air Basin experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of the Pacific high. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion (upper) layer until the inversion layer finally breaks, allowing vertical mixing with the lower layer. This phenomenon is observed in mid to late afternoons on hot summer days. Winter inversions frequently break by midmorning.

The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollutant concentrations are lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas are transported predominantly onshore into Riverside and San Bernardino Counties. In the winter, the greatest pollution problem is the accumulation of carbon monoxide (CO) and nitrogen oxides (NO_X) due to low inversions and air stagnation during the night and early morning hours. In the summer, the longer daylight hours and the brighter sunshine combine to cause a reaction between hydrocarbons and NO_X to form photochemical smog.

Air pollutant emissions within the Air Basin are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers,

agricultural fields, landfills, and some consumer products. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

Air Pollutant Types

Criteria Pollutants

The six principal pollutants for which national and State criteria and standards have been promulgated, known as "criteria pollutants", and which are most relevant to current air quality planning and regulation in the Air Basin include O_3, respirable and fine particulate matter (PM10 and PM2.5, respectively), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted for them.

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

Particulate Matter (PM10 and PM2.5): Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Respirable and fine particulate matter, PM10 and PM2.5, consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, such as pollen and windstorms, are naturally occurring. However, in dense urban areas, such as the City of Inglewood, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. The human body naturally prevents the entry of larger particles into the body. However, small particles can enter the body and become trapped in the nose, throat, and upper respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM10 and PM2.5. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Carbon Monoxide (CO): Carbon monoxide (CO) is a colorless, odorless gas primarily emitted from combustion processes and motor vehicles due to incomplete combustion of carbon-containing fuels, such as gasoline or wood. In dense urban areas, such as Inglewood where the Project is located, automobile exhaust accounts for the majority of CO emissions. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels.

Because CO is emitted directly from internal combustion engines, unlike O_3, motor vehicles operating at slow speeds are the primary source of CO in the Air Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

Nitrogen Dioxide (NO_2) and Nitrogen Oxides (NO_X): NO_2 is a nitrogen oxide compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. Of the seven types of NO_X compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic areas, particularly in dense urban areas, such as where the Project is located, may be exposed to higher concentrations of NO_2 than those indicated by regional monitors. NO_2 absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO_2 also contributes to the formation of PM10. NO_X irritate the nose and throat, and increase one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_X is as a precursor to the formation of O_3.

Sulfur Dioxide (SO_2): Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the predominant form found in the lower atmosphere and is a product of burning sulfur or burning materials that contain sulfur. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. Emissions of SO_2 aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

Lead (Pb): Pb is a metal found naturally in the environment as well as in manufactured products. The highest levels of Pb in air are usually found near Pb smelters. The major sources of Pb emissions to the air are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. Pb is also emitted from the sanding or removal of old lead-based paint (LBP). Pb emissions are primarily a regional pollutant. Pb affects the brain and other parts of the body's nervous system. Exposure to Pb in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

Additional Criteria Pollutants (California Only)

In addition to the national standards, the State of California regulates State-identified criteria pollutants, including sulfates (SO_4^2), hydrogen sulfide (H_2S), visibility-reducing particles, and vinyl chloride. With respect to the State-identified criteria pollutants, most land use development projects either do not emit them (i.e., H_2S [nuisance odor] and vinyl chloride), or otherwise account for these pollutants (i.e., $SO_4^2$and visibility reducing particles) through other criteria pollutants. For example, $SO_4^2$are associated with SO_X emissions, and visibility-reducing particles are associated with particulate matter emissions. A description of the health effects of the State-identified criteria air pollutants is provided below.

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

Hydrogen Sulfide (H_2S): H_2S is a colorless gas with the odor of rotten eggs. The most common sources of H_2S emissions are oil and natural gas extraction and processing, and natural emissions from geothermal fields. Industrial sources of H_2S include petrochemical plants and kraft paper mills. H_2S is also formed during bacterial decomposition of human and animal wastes, and is present in emissions from sewage treatment facilities and landfills.[4] Exposure to H_2S can induce tearing of the eyes and symptoms related to overstimulation of the sense of smell, including headache, nausea, or vomiting; additional health effects of eye irritation have only been reported with exposures greater than 50 parts per million (ppm), which is considerably higher than the odor threshold.[5] H_2S is regulated as a nuisance based on its odor detection level; if the standard were based on adverse health effects, it would be set at a much higher level.[6]

Visibility-Reducing Particles: Visibility-reducing particles come from a variety of natural and manmade sources and can vary greatly in shape, size and chemical composition. Visibility reduction is caused by the absorption and scattering of light by the particles in the atmosphere before it reaches the observer. Certain visibility-reducing particles are directly emitted to the air, such as windblown dust and soot, while others are formed in the atmosphere through chemical transformations of gaseous pollutants (e.g., SO_4^2, nitrates, organic carbon particles) which are the major constituents of particulate matter. As the number of visibility-reducing particles increases, more light is absorbed and scattered, resulting in less clarity, color, and visual range.[7] Exposure to some haze-causing pollutants have been linked to adverse health impacts similar to PM10 and PM2.5, as discussed above.[8]

Vinyl Chloride: Vinyl chloride is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products and is generally emitted from industrial processes. Other major sources of vinyl chloride have been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents.[9] Short-term health effects of exposure to high levels of vinyl chloride in the air include central nervous system effects, such as dizziness, drowsiness, and headaches while long-term exposure to vinyl chloride through inhalation and oral exposure causes liver damage and has been shown to increase the risk of angiosarcoma, a rare form

4 CARB, Hydrogen Sulfide & Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health. Accessed April 2025.

5 CARB, Hydrogen Sulfide & Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health. Accessed April 2025.

6 CARB, Hydrogen Sulfide & Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health. Accessed April 2025.

7 CARB, Visibility-Reducing Particles & Health. Last reviewed https://ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health. Accessed April 2025.

8 CARB, Visibility-Reducing Particles & Health. Last reviewed https://ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health. Accessed April 2025

9 CARB, Visibility-Reducing Particles & Health. Last reviewed https://ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health. Accessed April 2025

of liver cancer in humans.[10] Most health data on vinyl chloride relate to carcinogenicity and control methodologies applied to industrial facilities generally prevent emissions to the ambient air. There are no known sources of vinyl chloride emissions outside of occupational or industrial settings.[11]

Volatile Organic Compounds and Toxic Air Contaminants

Although the SCAQMD's primary mandate is attaining the NAAQS and the CAAQS for criteria pollutants within the Air Basin, SCAQMD also has a general responsibility to control emissions of air contaminants and prevent endangerment to public health. As a result, the SCAQMD has regulated pollutants other than criteria pollutants such as VOCs, TACs, greenhouse gases (GHGs), and stratospheric O_3-depleting compounds.

VOCs: VOCs are organic chemical compounds of carbon and are not "criteria" pollutants themselves; however, VOCs are a prime component (along with NO_X) of the photochemical processes by which such criteria pollutants as O_3, NO_2, and certain fine particles are formed. They are therefore regulated as "precursors" to formation of these criteria pollutants. Some are also identified as TACs and have adverse health effects. VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and consumer products (e.g., architectural coatings).

TACs: TACs is a term used to describe airborne pollutants that may be expected to result in an increase in mortality or serious illness or which may pose a present or potential hazard to human health, and includes both carcinogens and non-carcinogens. The California Air Resources Board (CARB) and the California Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. CARB has listed approximately 200 toxic substances, including those identified by the USEPA, which are identified on the California Air Toxics Program's TAC List. TACs are also not classified as "criteria" air pollutants. The greatest potential for TAC emissions during construction is related to diesel particulate matter (DPM) emissions associated with heavy-duty equipment. During long-term operations, sources of DPM may include heavy duty diesel-fueled delivery trucks and stationary emergency generators. The effects of TACs can be diverse and their health impacts tend to be local rather than regional; consequently ambient air quality standards for these pollutants have not been established, and analysis of health effects is instead based on cancer risk and exposure levels.

Regulatory Framework

Federal

Federal Clean Air Act

The Federal Clean Air Act (CAA) was enacted in 1970 and has been amended numerous times in subsequent years, with the latest amendments occurring in 1990.[12] The CAA is the comprehensive federal law that regulates air emissions in order to protect public health and welfare.[13] The USEPA is responsible for the implementation and enforcement of the CAA, which establishes NAAQS, specifies future dates

[10] CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health. Accessed April 2025.
[11] CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health. Accessed April 2025.
[12] 42 United States Code Section 7401 et seq. (1970).
[13] USEPA, Clean Air Act, 1963.

for achieving compliance, and requires the USEPA to designate areas as attainment, nonattainment, or maintenance. The CAA also mandates that each state submit and implement a State Implementation Plan (SIP) for each criteria pollutant for which the state has not achieved the applicable NAAQS. The SIP includes pollution control measures that demonstrate how the standards for those pollutants will be met. The sections of the CAA most applicable to land use development projects include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).[14]

Title I requirements are implemented for the purpose of attaining NAAQS for criteria air pollutants. **Table 4.2-1**, shows the NAAQS currently in effect for each criteria air pollutant. The Air Basin fails to meet national standards for O_3 and PM2.5 and, therefore, is considered a federal "non-attainment" area for these pollutants.

TABLE 4.2-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Period	Federal Standard[a,b]	California Standard[a,b]	South Coast Air Basin Attainment Status[c]	
				Federal Standard[d]	California Standard[d]
Ozone (O_3)	1-hour	—	0.09 ppm (180 µg/m^3)	—	Non-Attainment
	8-hour	0.070 ppm (137 µg/m^3)	0.07 ppm (137 µg/m^3)	Non-Attainment (Extreme)	Non-Attainment
Respirable Particulate Matter (PM10)	24-hour	150 µg/m^3	50 µg/m^3	Attainment	Non-Attainment
	Annual	—	20 µg/m^3		
Fine Particulate Matter (PM2.5)[f]	24-hour	35 µg/m^3	—	Non-Attainment (Serious)	Non-Attainment
	Annual	9 µg/m^3	12 µg/m^3		
Carbon Monoxide (CO)	1-hour	35 ppm (40 mg/m^3)	20 ppm (23 mg/m^3)	Attainment	Attainment
	8-hour	9 ppm (10 mg/m^3)	9.0 ppm (10 mg/m^3)		
Nitrogen Dioxide (NO_2)	1-hour	0.10 ppm (188 µg/m^3)	0.18 ppm (339 µg/m^3)	Unclassified/ Attainment	Attainment
	Annual	0.053 ppm (100 µg/m^3)	0.030 ppm (57 µg/m^3)		
Sulfur Dioxide (SO_2)	1-hour	0.075 ppm (196 µg/m^3)	0.25 ppm (655 µg/m^3)	Unclassified/ Attainment	Attainment

[14] USEPA, Clean Air Act Overview, Clean Air Act Table of Contents by Title, Last Updated January 3, 2017.

Pollutant	Averaging Period	Federal Standard[a,b]	California Standard[a,b]	South Coast Air Basin Attainment Status[c]	
				Federal Standard[d]	California Standard[d]
	3-hour	0.5 ppm (1,300 µg/m^3)	—		
	24-hour	0.14 ppm (365 µg/m^3)	0.04 ppm (105 µg/m^3)		
	Annual	0.03 ppm (80 µg/m^3)	—		
Lead (Pb)	30-day average	—	1.5 µg/m^3	Partial Non-Attainment[e]	Attainment
	Rolling 3-month average	0.15 µg/m^3	—		
Sulfates	24-hour	—	25 µg/m^3	—	Attainment
Hydrogen Sulfide (H_2S)	1-hour	—	0.03 ppm (42 µg/m^3)	—	Unclassified

Notes: ppm = parts per million by volume; µg/m3 = micrograms per cubic meter

a. An ambient air quality standard is a concentration level expressed in either ppm or µg/m3and averaged over a specific time period (e.g., 1 hour). The different averaging times and concentrations are meant to protect against different exposure effects. Some ambient air quality standards are expressed as a concentration that is not to be exceeded. Others are expressed as a concentration that is not to be equaled or exceeded.
b. Ambient Air Quality Standards set by USEPA and CARB as displayed in the 2022 AQMP.
c. "Attainment" means that the regulatory agency has determined based on established criteria, that the Air Basin meets the identified standard. "Non-attainment" means that the regulatory agency has determined that the Air Basin does not meet the standard. "Unclassified" means there is insufficient data to designate an area, or designations have yet to be made.
d. California and Federal standard attainment status as determined by USEPA and CARB as displayed in SCAQMD's 2022 AQMP and 2022 updates from CARB. https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations.
e. An attainment re-designation request is pending.
f. In 2024, the EPA revised the national annual average standard for PM2.5. This was prompted by evidence within new literature that showed continued risk of premature mortality and other health effects at lower PM2.5 concentrations than the previous annual average standard. The existing national 24- hour PM2.5 standards (primary and secondary) were retained at 35 µg/m3, as was the annual secondary standard of 15 µg/m3. The existing 24-hour PM10 standards (primary and secondary) of 150 µg/m3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

Sources: USEPA, NAAQS Table, https://www.epa.gov/criteria-air-pollutants/naaqs-table. Ambient Air Quality Standards December 16, 2024

Title II pertains to mobile sources, which includes on-road vehicles (e.g., cars, buses, motorcycles) and non-road vehicles (e.g., aircraft, trains, construction equipment). Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially and the specification requirements for cleaner burning gasoline are more stringent.

The NAAQS, and the CAAQS for the California criteria air pollutants (discussed below), have been set at levels considered safe to protect public health, including the health of sensitive populations and to protect public welfare.

State

California Clean Air Act

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the state to achieve and maintain the CAAQS by the earliest practicable date. (CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both State and

federal air pollution control programs within California. In this capacity, CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. Table 4.2-1 includes the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the state. As shown in Table 4.2-1, the CAAQS include more stringent standards than the NAAQS. The Air Basin fails to meet State standards for O_3, PM10, and PM2.5 and, therefore, is considered "non-attainment" for these pollutants.

California Code of Regulations

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

California Air Resources Board

CARB, a part of the California Environmental Protection Agency, is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's SIP, for which it works closely with the federal government and the local air districts. The SIP is required for the state to take over implementation of the federal CAA from USEPA.

On-Road and Off-Road Vehicle Rules

In 2004, CARB adopted an Airborne Toxic Control Measure (ATCM) to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to DPM and other TACs. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given time.

In 2008 CARB approved the Truck and Bus regulation to reduce NO_X, PM10, and PM2.5 emissions from existing diesel vehicles operating in California. The requirements were amended in December 2010 and apply to nearly all diesel fueled trucks and busses with a gross vehicle weight rating greater than 14,000 pounds. For the largest trucks in the fleet, those with a GVWR greater than 26,000 pounds must comply with a schedule by engine model year or owners can report to show compliance with more flexible options, such as the installation of DPM filters or low-use exemption.

In addition to limiting exhaust from idling trucks, CARB also promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower such as bulldozers, loaders, backhoes

and forklifts, as well as many other self-propelled off-road diesel vehicles. The In-Use Off-Road Diesel Fueled Fleets regulation adopted by the CARB on July 26, 2007, aims to reduce emissions by the installation of DPM filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models (13 CCR, Section 2449). The compliance schedule requires that equipment turn overs or retrofits be fully implemented by 2023 in all equipment for large and medium fleets and by 2028 for small fleets.

Advanced Clean Car Program

The Advanced Clean Cars emissions-control program was adopted by CARB in 2012 and is closely associated with other state-led emissions standards for passenger vehicles and light-duty trucks.[15] The program requires a greater number of ZEV models for years 2015 through 2025 to control smog, soot and GHG emissions. This program includes the Low-Emissions Vehicle regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles; and the ZEV regulations to require manufactures to produce an increasing number of pure ZEV's (meaning battery and fuel cell electric vehicles) with the provision to produce plug-in hybrid electric vehicles between 2018 and 2025.

Executive Order No. N-79-20 (adopted in September 2020) phases out the sales of new gasoline-fueled passenger cars by 2035 in California with an additional 10-year transition period for heavy vehicles. The State would not restrict used car sales, nor forbid residents from owning gas-powered vehicles. In accordance with the Executive Order, CARB is developing a 2020 Mobile Source Strategy, a comprehensive analysis that presents scenarios for possible strategies to reduce the carbon, toxic and unhealthy pollution from cars, trucks, equipment, and ships. The strategies will provide important information for numerous regulations and incentive programs going forward by conveying what is necessary to address the aggressive emission reduction requirements.

The primary mechanism for achieving the ZEV target for passenger cars and light trucks is CARB's Advanced Clean Cars II (ACC II) Program.[16] The ACC II regulations will rapidly scale down light-duty passenger car, pickup truck and SUV emissions starting with the 2026 model year through 2035. The ACC II regulation amends the Zero-emission Vehicle Regulation to require an increasing number of zero-emission vehicles, and relies on currently available advanced vehicle technologies, including battery-electric, hydrogen fuel cell electric and plug-in hybrid electric-vehicles, to meet air quality and climate change emissions standards which supports Executive Order N-79-20 that requires all new passenger vehicles sold in California to be zero emissions by 2035. Additionally, the ACC II regulation amends the Low-emission Vehicle Regulations to include increasingly stringent standards for gasoline cars and heavier passenger trucks to continue to reduce smog-forming emissions.

Advanced Clean Trucks Program

The Advanced Clean Trucks regulations were approved on June 25, 2020, and require that manufacturers sell zero-emissions or near-zero-emissions trucks as an increasing percentage of their annual California sales beginning in 2024. The goal of this proposed strategy is to achieve nitrogen oxide (NOx) and GHG emission reductions through advanced clean technology, and to increase the penetration of the first wave of zero-emissions heavy-duty technology into applications that are well suited to its use. According to

[15] CARB, Clean Car Standards – Pavley, Assembly Bill 1493.

[16] CARB, Advanced Clean Cars II. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/advanced-clean-cars-ii. Accessed April 2025.

CARB, "Promoting the development and use of advanced clean trucks will help CARB achieve its emission reduction strategies as outlined in the SIP, Sustainable Freight Action Plan, SB 350, and AB 32".[17] The percentage of zero-emissions truck sales is required to increase every year until 2035 when sales would need to be 55 percent of Classes 2b–3 (light/medium- and medium-duty trucks) truck sales, 75 percent of Classes 4–8 (medium- to heavy-duty trucks) straight truck sales, and 40 percent of truck tractor (heavy-duty trucks weighing 33,001 pounds or greater) sales. Additionally, large fleet operators (of 50 or more trucks) would be required to report information.

State Programs for Toxic Air Contaminants

The California Air Toxics Program is an established two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air. In the risk identification step, CARB and OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of Airborne Toxic Control Measures (ATCMs), both for stationary and mobile sources, including On-Road and Off-Road Vehicle Rules. These ATCMs include measures such as limits on heavy-duty diesel motor vehicle idling and emission standards for off-road diesel construction equipment in order to reduce public exposure to DPM and other TACs. These actions are also supplemented by the Assembly Bill (AB) 2588 Air Toxics "Hot Spots" program and Senate Bill (SB) 1731, which require facilities to report their air toxics emissions, assess health risks, notify nearby residents and workers of significant risks if present, and reduce their risk through implementation of a risk management plan. SCAQMD has further adopted two rules to limit cancer and non-cancer health risks from facilities located within its jurisdiction. Rule 1401 (New Source Review of Toxic Air Contaminants) regulates new or modified facilities, and Rule 1402 (Control of Toxic Air Contaminants from Existing Sources) regulates facilities that are already operating. Rule 1402 incorporates requirements of the AB 2588 program, including implementation of risk reduction plans for significant risk facilities.

Diesel Risk Reduction Program

CARB identified particulate emissions from diesel-fueled engines as TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which moved us into the risk management phase of the program. CARB developed the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines* and the *Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines*. The Diesel Advisory Committee approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific statewide regulations designed to further reduce DPM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce DPM emissions.

[17] CARB, Advanced Clean Trucks Program. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks/about. Accessed April 2025.

Regional

South Coast Air Quality Management District

The SCAQMD is primarily responsible for planning, implementing, and enforcing air quality standards for the South Coast Air Basin. The Air Basin is a subregion within the western portion of the SCAQMD jurisdiction, as the SCAQMD also regulates portions of the Salton Sea Air Basin and Mojave Desert Air Basin within Riverside County.

Air Quality Management Plan and Regional Transportation Plan/Sustainable Communities Strategy

To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs), which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the Air Basin into attainment with the standards in a timely manner. The most current AQMP is the *2022 Air Quality Management Plan* (2022 AQMP)[18], which was adopted on December 2, 2022. The goal of the 2022 AQMP is to provide a regional roadmap to help the Air Basin achieve the USEPA's NAAQS 2015 8-hour ozone standard (70 parts per billion).

On January 26, 2023, CARB adopted Resolution 23-4, which directs the CARB Executive Officer to submit the 2022 AQMP to the USEPA for inclusion in the California SIP to be effective, for purposes of federal law, after notice and public hearing as required by Section 110(l) of the Clean Air Act and 40 Code of Federal Regulations Section 51.102 and approval by the USEPA. USEPA approval has not yet occurred.

The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard.

The 2022 AQMP incorporates the transportation strategy and transportation control measures from SCAG's Connect SoCal 2020 (2020-2045 *Regional Transportation Plan/Sustainable Communities Strategy* [2020-2045 RTP/SCS]).[19] SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. Connect SoCal 2020 includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the AQMP.

[18] SCAQMD, 2022 Air Quality Management Plan, 2022.

[19] SCAG, Final 2020-2045 RTP/SCS (Connect SoCal), 2020.

The 2022 AQMP forecasts future emissions inventories with growth based on SCAG's Connect SoCal 2020. According to the 2022 AQMP, the South Coast Air Basin is projected to see a 12 percent growth in population, 17 percent growth in housing units, 11 percent growth in employment, and an 8 percent growth in VMT between 2018 and 2037. Despite regional growth in the past, air quality has improved substantially over the years, primarily due to the effects of air quality control programs at the local, state and federal levels.[20] The growth projections in the Connect SoCal 2020 are based in part on projections originating under County and City General Plans. The Connect SoCal 2020 growth projections are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. While the 2024–2050 RTP/SCS (Connect SoCal 2024) has been released, as discussed below, it has not been incorporated into the AQMP and, therefore, the 2020–2045 RTP remains applicable for purposes of addressing air quality impacts and conflicts with the AQMP. [21]

Noteworthy control strategies for mobile sources in the AQMP with potential applicability to reducing short-term emissions from construction activities associated with the Project include strategies denoted in the 2022 AQMP as MOB-06, MOB-11, and MOB-15, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment.[22] Descriptions of measures MOB-06, MOB-11, and MOB-15 are provided below:

- **MOB-06 – Accelerated Retirement of Older On-Road Heavy-Duty Vehicles:** This measure seeks additional emission reductions from existing heavy-duty vehicles with GVWR greater than 8,500 lbs through an accelerated vehicle replacement program with zero or low NO_X emission vehicles.
- **MOB-11 – Emission Reductions from Incentive Programs:** This control measure seeks to quantify and take credit for the emission reductions achieved through the implementation of SCAQMD administered incentive programs for SIP purposes. The South Coast AQMD has been implementing a variety of incentive programs including, but not limited to, Carl Moyer Memorial Air Quality Standards Attainment Program, Proposition 1B, Lower Emission School Bus, Community Air Protection Program, and Volkswagen Environmental Mitigation Trust. Examples of projects funded by these programs include heavy-duty vehicle/equipment replacements, installation of retrofit units, and engine repowers. These incentive programs result in substantial emission reductions that are typically not eligible for credit in plans to attain ozone standards because they are not required by regulation. However, actual emission reductions that are realized and quantified may qualify for credit.
- **MOB-15 – Zero Emission Infrastructure for Mobile Sources:** This control measure is intended to support and accelerate the deployment of zero emission infrastructure needed for the widespread adoption of zero emission vehicles and equipment. AB 2127 estimated that the State will need 157,000 electric vehicle charging stations for medium and heavy-duty vehicles by 2030. AB 8 assessed the fueling needs for hydrogen fuel cell vehicles and found that 1,700 hydrogen stations will be needed to support 1.8 million fuel cell electric vehicles (FCEVs) statewide by 2035. The proposed measure seeks to address these concerns and identify the unique challenges and opportunities for zero emission

[20] SCAQMD, 2022 Air Quality Management Plan, Table 3-3, 2022.

[21] SCAG, 2024, 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy, https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547. Accessed March 1, 2025.

[22] SCAQMD, 2022 Air Quality Management Plan, pages 4-21 through 4-30, 2022.

infrastructure development in the South Coast Air Basin, particularly as it relates to zero emission medium and heavy vehicle deployments.

SCAQMD Air Quality Guidance Documents

The SCAQMD published the *CEQA Air Quality Handbook* (approved by the SCAQMD's Governing Board in 1993) to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.[23] The *CEQA Air Quality Handbook* provides standards, methodologies, and procedures for conducting air quality analyses. The SCAQMD has also provided supplemental guidance on the SCAQMD website to assist the CEQA practitioners in conducting an air quality analyses, such as the *Final Localized Significance Threshold Methodology*, which is discussed below.[24]

The SCAQMD has also adopted land use planning guidelines in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, which considers impacts to sensitive receptors from facilities that emit TAC emissions.[25] SCAQMD's siting distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity to freeways and high-traffic roads, and the same siting criteria for distribution centers and dry-cleaning facilities). The SCAQMD's document introduces land use-related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. SCAQMDs guidelines are voluntary initiatives recommended for consideration by local planning agencies.

The SCAQMD has published a guidance document called the *Final Localized Significance Threshold Methodology* for CEQA evaluations that is intended to provide guidance when evaluating the localized effects from mass emissions during construction or operation of a project.[26] The SCAQMD adopted additional guidance regarding PM2.5 emissions in a document called *Final Methodology to Calculate Particulate Matter (PM)2.5 and PM2.5 Significance Thresholds*.[27] The latter document has been incorporated by the SCAQMD into its CEQA significance thresholds and *Final Localized Significance Threshold Methodology.*

SCAQMD Rules and Regulations

The SCAQMD has adopted several rules and regulations to regulate sources of air pollution in the Air Basin and to help achieve air quality standards for land use development projects, which include, but are not limited to the following:

Regulation IV – Prohibitions: This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-up/shutdown exemptions and breakdown events. The following list of rules which apply to the Project:

- **Rule 401 – Visible Emissions**: This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods

[23] SCAQMD, CEQA Air Quality Handbook 1993, CEQA Air Quality Handbook (1993). Accessed April 2025.

[24] SCAQMD, Air Quality Analysis Guidance, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#. Accessed April 2025.

[25] SCAQMD Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, 2005.

[26] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 (Revised July 2008).

[27] SCAQMD, Final Methodology to Calculate Particulate Matter (PM)2.5 and PM2.5 Significance Thresholds, 2006.

aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.

- **Rule 402 – Nuisance**: This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **Rule 403 – Fugitive Dust:** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM10 emissions to less than 50 micrograms per cubic meter (µg/m3) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Mitigation measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Finally, a contingency plan may be required if so determined by the USEPA.

Regulation XI – Source Specific Standards: Regulation XI sets emissions standards for specific sources. The following is a list of rules which may apply to the Project:

- **Rule 1113 – Architectural Coatings**: This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.
- **Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters:** This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NO_X emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.
- **Rule 1186 – PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations:** This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM10 emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).

Regulation XIII – New Source Review (NSR): Regulation XIII sets requirements for preconstruction review required under both federal and state statutes for new and modified sources located in areas that do not meet the Clean Air Act standards ("non-attainment" areas). NSR applies to both individual permits and entire facilities. Any permit that has a net increase in emissions is required to apply Best Available Control Technology (BACT). Facilities with a net increase in emissions are required to offset the emission increase by use of Emission Reduction Credits (ERCs). The regulation provides for the application, eligibility, registration, use and transfer of ERCs. For low emitting facilities, the SCAQMD maintains an internal bank that can be used to provide the required offsets. In addition, certain facilities are subject to provisions that require public notice and modeling analysis to determine the downwind impact prior to permit issuance.

Regulation XIV – Toxics and Other Non-Criteria Pollutants: Regulation XIV sets requirements for new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants or other non-criteria pollutants. The following is a list of rules which may apply to the Project:

- **Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities:** This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.

Local

City of Inglewood General Plan

The City General Plan Environmental Justice Element contains policies and goals related to General Environmental Health, Access, and Connectivity. The following goals and measures would be relevant to the Project.

Environmental Justice Element

Section 2: Land Use and Environment

Policy EJ-2.4: Create land use patterns and public amenities that encourage people to walk, bicycle and use public transit.

Policy EJ-2.8: Encourage new development to reduce vehicle miles traveled to reduce pollutant emissions.

Policy EJ-2.9: Work with the South Coast Air Quality Management District (SCAQMD), the Los Angeles International Airport (LAX) and other appropriate agencies to monitor and improve air quality in the City of Inglewood.

Policy EJ-2.10: Implement and periodically update the City's Energy and Climate Action Plan to improve air quality and reduce greenhouse gas emissions.

Policy EJ-2.27: Enforce the state's 5-minute maximum idling limitation for sleeper diesel trucks and trucks with a gross vehicle weight rating over 10,000 pounds.

Section 3: Mobility and Active Living

Policy 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.

Policy EJ-3.2: Facilitate pedestrian and bicycle access to parks and open space through infrastructure investments and improvements.

Policy EJ-3: Partner with the Inglewood Unified School District and non-profit organizations to improve access to bicycles, helmets, and related equipment for lower income families.

Policy EJ-3.4: Require the provision of on-site bicycle facilities in new large-scale development projects.

Existing Conditions

Regional Air Quality

The Southern California region lies in the semi-permanent high-pressure zone of the eastern Pacific that leads to mild climate, moderated by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle) play a major role in degree and severity of the air pollution problem in the Air Basin where factors, such as wind, sunlight, temperature, humidity, rainfall, and topography, affect the accumulation and dispersion of air pollutants throughout the Air Basin, making it an area of high pollution potential.

The greatest air pollution throughout the Air Basin occurs from June through September that is generally attributed to light winds, shallow vertical atmospheric mixing, as well as the large amount of pollutant emissions. This frequently reduces pollutant dispersion, resulting in elevated air pollution levels. In addition, pollutant concentrations in the Air Basin vary with location, season, and time of day. For instance, O_3 concentrations tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Air Basin and adjacent desert. While substantial progress has been made in reducing air pollution levels in Southern California, the Air Basin still fails to meet the national standards for O_3 and PM2.5 and, therefore, is considered a federal "non-attainment" area for these pollutants. In addition, Los Angeles County still fails to meet the national standard for Pb and, therefore, is considered a federal "non-attainment" area for Pb.

As described above, at the regional level, SCAQMD is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange County, Riverside and San Bernardino Counties. Specifically, the SCAQMD has the responsibility for ensuring that all national and State ambient air quality standards are achieved and maintained throughout the Air Basin. To meet the standards, SCAQMD has adopted a series of AQMPs. The 2022 AQMP builds upon measures already in place from previous AQMPs and includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies and low NOx technologies), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard by 2037. However, the 2037 NO_X limit is 60 tons per day and emissions from federal and international sources are estimated to be 85 tons per day in 2037; thus, federal sources alone would emit more than the 60 tons per day limit in 2037. The SCAQMD and CARB cannot sufficiently reduce NO_X emissions to meet the standard without federal action.

The 2022 AQMP states that despite the projected growth in the region, air quality has improved substantially over the years. This is largely due to the effects of local, State and federal air quality control programs as described above. As seen in Figure 1-4 on page 1-9 of the AQMP, the percent change in air quality is shown along with demographic data for the 4-county region from the 2022 AQMP where in particular, the trends since 1995 of the 8-hour O_3 levels, the 1-hour O_3 levels, and annual average PM2.5 concentrations (since 2001), compared to the regional gross domestic product, total employment and population. In addition, the O_3 and particulate matter levels continue to trend downward as the economy

and population increase, demonstrating that it is possible to maintain a healthy economy while improving public health through air quality improvements.[28]

Attainment Status

The extent and severity of pollutant concentrations in the Air Basin are a function of the area's natural physical characteristics (weather and topography) and man-made influences (development patterns and lifestyle). Factors, such as wind, sunlight, temperature, humidity, rainfall, and topography, all affect the accumulation and dispersion of pollutants throughout the Air Basin, making it an area of high pollution potential. The Air Basin's meteorological conditions, in combination with regional topography, are conducive to the formation and retention of ozone, which is a secondary pollutant that forms through photochemical reactions in the atmosphere. California Health and Safety Code Section 39607(e) requires CARB to establish and periodically review area designation criteria. Table 4.2-1 above, also provides a summary of the attainment status of the Los Angeles County portion of the Air Basin with respect to the federal and State standards. The Air Basin is designated as attainment for the California standards for sulfates and unclassified for hydrogen sulfide and visibility-reducing particles.[29] The Air Basin is currently in non-attainment for O_3, PM10, and PM2.5 under the CAAQS and O_3, and PM2.5 under the NAAQS. Since vinyl chloride is a carcinogenic toxic air contaminant, CARB does not classify attainment status for this pollutant. Health and Safety Code Section 39607(e) requires CARB to establish and periodically review area designation criteria.

The Los Angeles County portion of the Air Basin is designated as nonattainment for the federal lead standard; however, this is due to localized emissions from two lead-acid battery recycling facilities in the City of Vernon and the City of Industry that are no longer operating.[30]

Trace amounts of hydrogen sulfide may be emitted by common municipal solid waste such as household food wastes. Vinyl chloride is used in the process of making polyvinyl chloride (PVC) plastic and vinyl products and is primarily emitted from industrial processes.[31] Vinyl chloride generally is not emitted directly during operations or during construction of a land use development project. The proposed Project does not include vinyl chloride emitting processes. Land developments only emit trace amounts or otherwise account for sulfates and visibility-reducing particles through other criteria pollutants. As previously stated, sulfates are associated with SO_2 emissions and visibility-reducing particles are associated with particulate matter emissions. Therefore, these pollutants will not independently be evaluated as they are associated with other criteria pollutants.

Sources of Emissions

As detailed in the AQMP, the major sources of air pollution in the Air Basin are divided into four major source classifications: point stationary sources, area stationary sources, on-road mobile sources, and off-road mobile sources. Point and area sources are the two major subcategories of stationary sources.[32] Point

[28] SCAQMD, 2022 AQMP, December 2022, page 1-9.

[29] Unclassified is the category designation of an area for a pollutant with insufficient data. CARB, Proposed 2017 Amendments to Area Designations for State Ambient Air Quality Standards, December 19, 2017 (release date).

[30] SCAQMD, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.

[31] CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health. Accessed April 2025.

[32] SCAQMD, 2022 Air Quality Management Plan, p. 3-1.

sources are permitted facilities that contain one or more emission sources at an identified location (e.g., power plants, refineries, emergency generator exhaust stacks). Area sources consist of many small emission sources (e.g., residential water heaters, architectural coatings, and consumer products), which are distributed across the region. Mobile sources consist of two main subcategories: On-road sources (such as cars and trucks), and off-road sources (such as heavy construction equipment).

Local Air Quality

Existing Criteria Pollutants Levels at Nearby Monitoring Stations

The SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin to measure ambient pollutant concentrations. As shown in **Figure 4.2-1**, the Project Site is located in SCAQMD Source Receptor Area (SRA) 3; therefore, the monitoring station most representative of the Project Site is the Los Angeles-Westchester Parkway monitoring station. However, this station does not have complete data for all years. Data from the Central Los Angeles monitoring station (SRA 1) was used when necessary. The most recent data available from the SCAQMD for these monitoring stations are from years 2022 to 2024. The pollutant concentration data for these years are summarized in **Table 4.2-2**.

Toxic Air Contaminants

In August 2021, the SCAQMD released the Final Multiple Air Toxics Exposure Study V (MATES V).[33] The MATES V study includes a fixed site monitoring program with ten stations, an updated emissions inventory of TACs, and a modeling effort to characterize risk across the Air Basin. The purpose of the fixed site monitoring is to characterize long-term regional air toxics levels in residential and commercial areas. In addition to new measurements and updated modeling results, several key updates were implemented in MATES V. MATES V estimates cancer risks by taking into account multiple exposure pathways, which includes inhalation and non-inhalation pathways. This approach is consistent with how cancer risks are estimated in SCAQMD's programs such as permitting, Air Toxics Hot Spots (AB 2588), and CEQA. Previous MATES studies quantified the cancer risks based on the inhalation pathway only. Along with cancer risk estimates, MATES V includes information on the chronic noncancer risks from inhalation and non-inhalation pathways for the first time. Cancer risks and chronic noncancer risks from MATES II through IV measurements have been re-examined using current OEHHA and CalEPA risk assessment methodologies and modern statistical methods to examine the trends over time. This has led to a reduction of the Basin Average Air Toxics Cancer Risk in MATES V, 455 in a million, from MATES IV, 997 in a million.[34] The key takeaways from the MATES V study are as follows: air toxics cancer risk has decreased by about 50 percent since MATES IV based on modeling data, MATES V Basin average multi-pathway air toxics cancer risk is 455 in a million, with the highest risk locations being near Los Angeles International Airport, downtown and the ports areas, DPM is the main risk driver for air toxics cancer risk, goods movement and transportation corridors have the highest air toxics cancer risks, and the chronic noncancer risk was estimated for the first time with a chronic hazard index of approximately 5 to

[33] SCAQMD, MATES V, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v. Accessed April 2025.

[34] SCAQMD, MATES V, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v. Accessed July 8, 2022.

9 across the ten fixed stations. As shown in **Figure 4.2-2**, the Project Site has an average background cancer risk of 558 in 1 million in zip code 90301 (Inglewood).[35]

Existing Project Site Emissions

The Project Site is currently occupied by Inglewood High School. The primary campus development is situated in the eastern portion of campus and consists of classroom and administrative buildings. Currently, athletic courts and fields are located on the western portion of the campus. However, in order to provide a conservative analysis, no credit is taken for existing operational air quality emissions and the Project's air quality emissions are conservatively considered new.

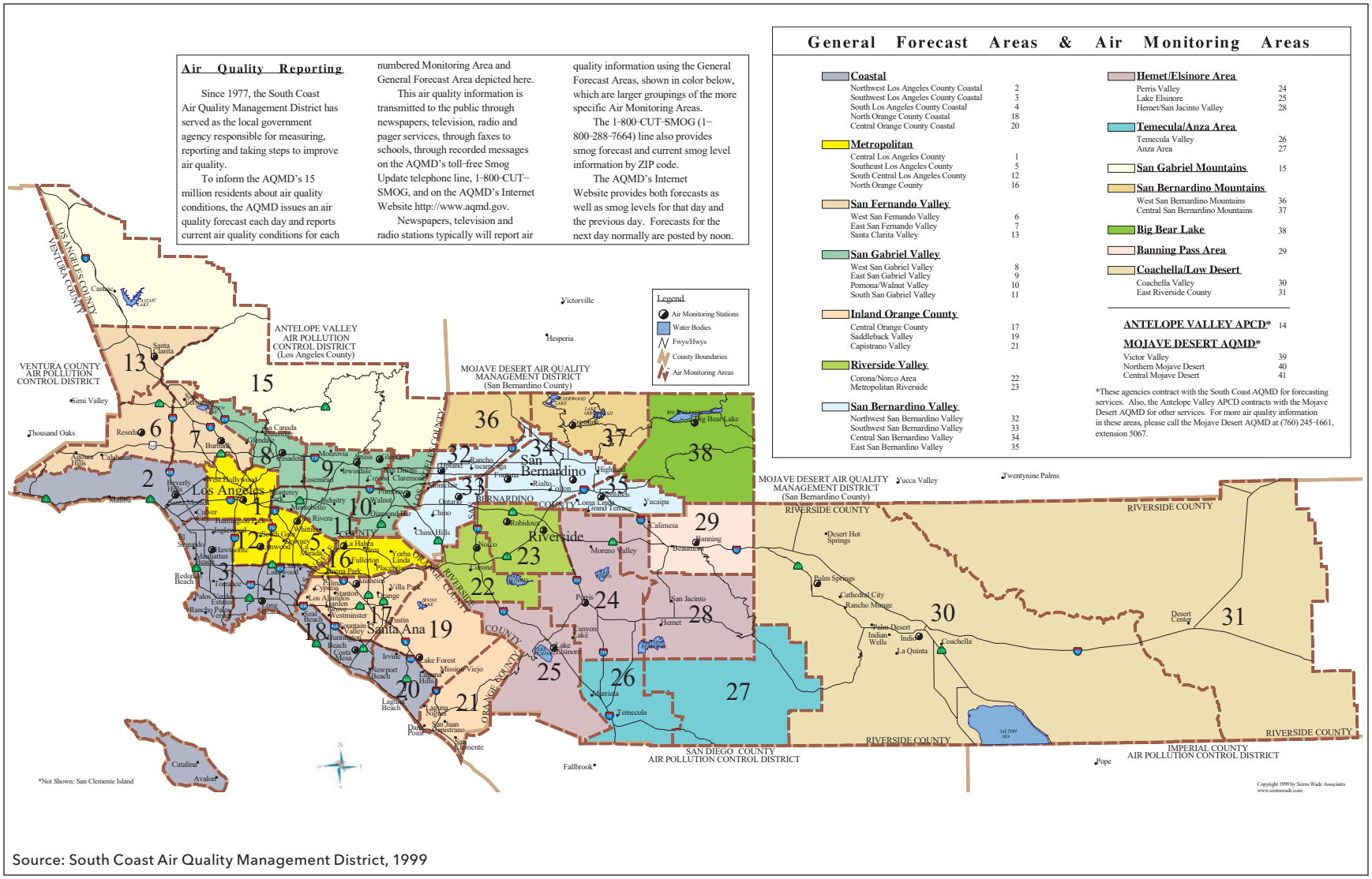
Air Quality Sensitive Receptors and Locations

Certain population groups, such as children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to the potential effects of air pollution than others.[36] As a result, certain land uses that are occupied by these population groups, such as residences, schools, playgrounds and childcare centers, hospitals, rehabilitation centers, convalescent centers, and retirement homes are considered to be air quality sensitive land uses (i.e., air quality–sensitive receptors). The nearest sensitive land uses to the Project Site include single family residences adjacent to the western border of the Project Site, along West Olive Street. Single family and multi-family residences are also located directly to the south of the Project Site, across West Kelso Street, to the east across South Grevillea Avenue and to the north across West Manchester Boulevard. Additionally, future sensitive receptors would include the future multi-family residential uses to the south of the Pacific Rim Apartments, on the south side of East Nutwood Street.

As shown in **Figure 4.2-3**, all other air quality sensitive receptors are located at greater distances from the Project Site, and would be less impacted by Project emissions. Impacts are quantified for the sensitive receptors discussed above and represent the sensitive land uses that would have the maximum potential impacts from Project-related localized emissions.

[35] SCAQMD, MATES V, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v. Accessed April 2025.

[36] SCAQMD, CEQA Air Quality Handbook 1993, CEQA Air Quality Handbook (1993). Accessed April 2025.



Source: South Coast Air Quality Management District, 1999

Figure 4.2-1
SCAQMD General Forecast Areas and Air Monitoring Areas
Inglewood High School Reconstruction

D202400867.01 - Inglewood High School Reconstruction\05 Graphics-GIS-Modeling-USE AZURE\DEIR

TABLE 4.2-2
AMBIENT AIR QUALITY DATA

Pollutant/Standard[a,b]	2022	2023	2024
O_3 (1-hour)	0.138	0.097	0.107
Maximum Concentration (ppm)	1	1	2
Days > CAAQS (0.09 ppm)			
O_3 (8-hour)	0.090	0.082	0.081
Maximum Concentration (ppm)	0.073	0.075	0.072
4th High 8-hour Concentration (ppm)	6	7	6
Days > CAAQS (0.070 ppm)	2	3	3
Days > NAAQS (0.075 ppm)			
NO_2 (1-hour)	0.075	0.064	0.080
Maximum Concentration (ppm)	0.057	0.052	0.053
98th Percentile Concentration (ppm)			
NO_2 (Annual)	0.019	0.016	0.017
Annual Arithmetic Mean (0.030 ppm)			
CO (1-hour)	1.7	1.4	1.8
Maximum Concentration (ppm)			
CO (8-hour)	1.5	1.2	1.6
Maximum Concentration (ppm)			
SO_2 (1-hour)	0.007	0.008	0.002
Maximum Concentration (ppm)	0.002	0.002	0.002
99th Percentile Concentration (ppm)			
SO_2 (24-hour)	--	--	--
Maximum Concentration (ppm)			
PM10 (24-hour)	60	57	77
Maximum Concentration (µg/m^3)	4	2	10
Samples > CAAQS (50 µg/m^3)	0	0	0
Samples > NAAQS (150 µg/m^3)			
PM10 (Annual Average)	28.9	24.3	25.4
Annual Arithmetic Mean (20 µg/m^3)			
PM2.5 (24-hour)	33.7	30.6	55.7
Maximum Concentration (µg/m^3)	21.9	23.4	34.2
98th Percentile Concentration (µg/m^3)	0	0	5
Samples > NAAQS (35 µg/m^3)			
PM2.5 (Annual)	10.94	10.25	12.01
Annual Arithmetic Mean (12 µg/m^3)			
Lead	0.006	0.007	0.008
Maximum 30-day average (µg/m^3)			

Notes: ppm = parts per million; µg/m^3 = micrograms per cubic meter.

a. The monitoring station most representative of the Project Site the Southwest Coastal LA County Monitoring Station and criteria pollutants monitored at this station include ozone, NO2, CO, SO2, lead, and PM10. However, this station does not have complete data for all years. Data from the Central Los Angeles monitoring station (SRA 1) were used when necessary. The most recent data available from SCAQMD for these monitoring stations are from years 2022 to 2024.

b. CAAQS are based on a not to exceed standard. NAAQS are based on a 3-year average of the annual 4th highest daily maximum 8-hour concentration for ozone; 98th percentile of 1-hour daily maximum concentrations averaged over 3 years for 1-hr NO_2; and not to be exceeded more than once per year on average over 3 years for 24-hr PM.

Sources: SCAQMD, Historical Data by Year, https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year. Accessed August 2025.

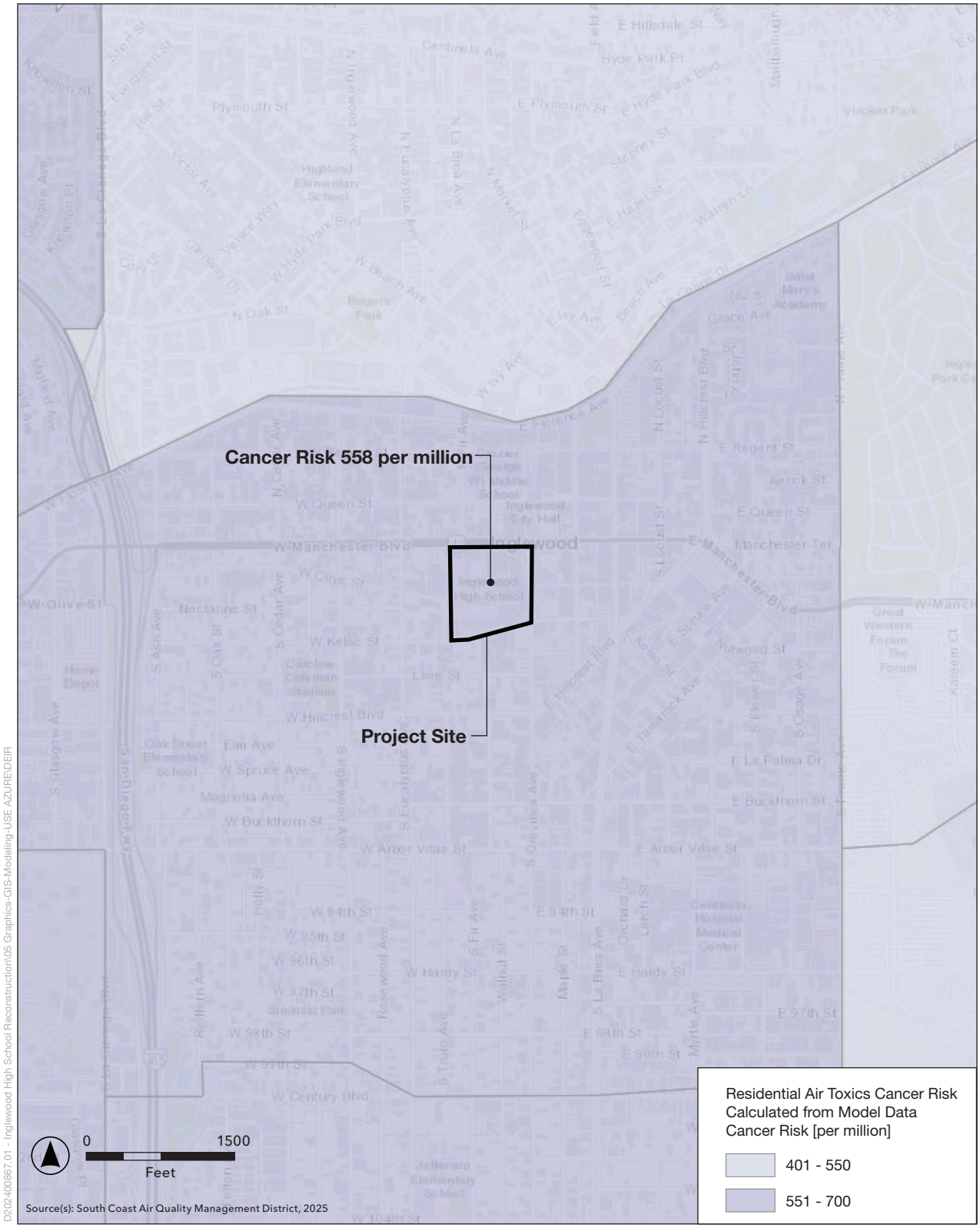


Figure 4.2-2
MATES Cancer Risk
Inglewood High School Reconstruction



Figure 4.2-3
Air Quality Sensitive Receptors
Inglewood High School Reconstruction

4.2.3 Project Impacts

Thresholds of Significance

The following significance thresholds below are based on the Environmental Checklist contained in Appendix G of the CEQA Guidelines. A project would have a significant impact related to air quality if it would:

- **Threshold AIR-1:** Conflict with or obstruct implementation of the applicable air quality plan;
- **Threshold AIR-2:** Result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;[37] or
- **Threshold AIR-3:** Expose sensitive receptors to substantial pollutant concentrations.
- **Threshold AIR-4:** Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Potentially significant impacts related to air quality are discussed and analyzed further below.

The District determined in the Initial Study that the following environmental issue areas would result in no impacts or less-than-significant impacts and, therefore, are scoped out of this Draft EIR. Please refer to Appendix A-2 of this Draft EIR for a copy of the Initial Study and additional information regarding Threshold AIR-4.

As detailed in the Initial Study, impacts related to other emissions, such as those leading to odors, were determined to be less than significant, and therefore are not addressed in this Draft EIR.

Pursuant to the CEQA Guidelines (Section 15064.7), a lead agency may consider using, when available, significance thresholds established by the applicable air quality management district or air pollution control district when making determinations of significance. For purposes of this analysis, the District has determined to assess the potential air quality impacts of the Project in accordance with the latest thresholds adopted by the SCAQMD in connection with its CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook, and subsequent SCAQMD guidance. While the SCAQMD CEQA Air Quality Handbook contains significance thresholds for lead, Project construction and operation would not include sources of lead emissions and would therefore not exceed the significance thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from mixed-use land use projects such as the Project. As a result, lead emissions are not further evaluated in this Draft EIR.

[37] For the purposes of this Draft EIR, the analysis included all regulated criteria pollutants, regardless of attainment status, for exceedances of applicable federal or state ambient air quality standards.

Consistency with Applicable Air Quality Plan

CEQA Guidelines Section 15125 requires an analysis of project consistency with applicable governmental plans and policies. In accordance with the SCAQMD's CEQA Air Quality Handbook, the following criteria were used to evaluate the Project's consistency with the SCAQMD's 2022 AQMP:

- Criterion 1: Will the Project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations; or
  - Cause or contribute to new air quality violations; or
  - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Criterion 2: Will the Project exceed the assumptions utilized in preparing the AQMP?

Construction and Operational Emission Air Quality Standards

A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or State non-attainment pollutant. The Air Basin is currently in non-attainment for O_3, PM10, PM2.5, and lead (which is only in non-attainment for the Los Angeles County portion of the Basin).[38] SCAQMD methodology recommends that significance thresholds be used to determine the potential cumulative impacts to regional air quality along with a project's consistency with the current AQMP.

SCAQMD has established numerical significance thresholds for construction and operational activities. The numerical thresholds are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health.[39] Given that construction impacts are temporary and limited to the construction phase, SCAQMD has established numerical significance thresholds specific to construction activity. Based on the thresholds in the SCAQMD CEQA Air Quality Handbook, the Project would potentially result in a significant impact of a federal or State non-attainment pollutant if emissions of O_3 precursors (VOC and NOx), PM10, or PM2.5 would exceed the values shown in **Table 4.2-3**.[40]

TABLE 4.2-3
SCAQMD REGIONAL EMISSIONS THRESHOLDS (POUNDS PER DAY)

Activity	VOC	NOx	CO	SO2	PM10	PM2.5
Construction	75	100	550	150	150	55
Operation	55	55	550	150	150	55

Source: SCAQMD, SCAQMD Air Quality Significance Thresholds, March 2023

[38] SCAQMD has the Partial Nonattainment designation – Los Angeles County portion of the Basin resulted from localized emissions from the two sources in the City of Vernon and the City of Industry that are no longer in operation. It is expected that this area would receive redesignation to attainment based on current monitoring data. SCAQMD, National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin.

[39] SCAQMD, CEQA Air Quality Handbook 1993, CEQA Air Quality Handbook (1993). Accessed April 2025.

[40] SCAQMD, Air Quality Significance Thresholds, March 2023.

Localized Significance Thresholds

In addition, SCAQMD has developed a methodology to assess the potential for localized emissions to cause an exceedance of applicable ambient air quality standards or ambient concentration limits. Impacts would be considered significant if the following would occur:

- Maximum daily localized emissions of NO_X and/or CO during construction or operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for NO_2 and/or CO.[41]
- Maximum daily localized emissions of PM10 and/or PM2.5 during construction are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed 10.4 $\mu g/m^3$ over 24 hours (SCAQMD Rule 403 control requirement).
- Maximum daily localized emissions of PM10 and/or PM2.5 during operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed 2.5 $\mu g/m^3$ over 24 hours (SCAQMD Rule 1303 allowable change in concentration).
- The following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
  - The Project would cause or contribute to an exceedance of the CAAQS one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively.
  - Where the CO standard is exceeded at the intersection, a project would result in a significant impact if the incremental increase due to the project is equal to or greater than 1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard.

SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards or ambient concentration limits without project-specific dispersion modeling.[42] This analysis uses the screening criteria to evaluate impacts from localized emissions where applicable.

Toxic Air Contaminants

Based on criteria set forth by the SCAQMD, the Project would expose sensitive receptors to substantial concentrations of toxic air contaminants if any of the following were to occur:[43]

- The Project would expose sensitive receptors to substantial concentrations of TACs if it emits carcinogenic materials or TACs that exceed the maximum incremental cancer risk of 10 in one

[41] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

[42] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

[43] South Coast Air Quality Management District, South Coast AQMD Air Quality Significance Thresholds, March 2023. https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=f7601d61_25. Accessed April 2025.

million or a cancer burden greater than 0.5 excess cancer cases (in areas greater than or equal to one in one million) or an acute or chronic hazard index of 1.0.

As discussed further below, *Methodology,* construction impacts from TACs are evaluated quantitatively in a construction Health Risk Assessment (HRA) due to the use of heavy-duty, diesel equipment. For operations, the impacts are analyzed qualitatively due to the limited and minimal sources of TACs associated with operation of the proposed land uses.

Methodology

The evaluation of potential impacts to regional and local air quality that may result from the construction and long-term operations of the Project is discussed below. Additional details are provided in the Air Quality and Greenhouse Gas Emissions Calculations in Appendix C of this Draft EIR.

SCAQMD Air Quality Guidance Documents

The SCAQMD published the CEQA Air Quality Handbook to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.[44] The CEQA Air Quality Handbook provides standards, methodologies, and procedures for conducting air quality analyses in EIRs and was used extensively in the preparation of this analysis. SCAQMD is currently in the process of replacing the CEQA Air Quality Handbook with the Air Quality Analysis Guidance Handbook.

Supplemental guidance/information to assist lead agencies is provided on the SCAQMD website (www.aqmd.gov/ceqa/hdbk.html) and includes: (1) EMission FACtor model (EMFAC) on-road vehicle emission factors; (2) background CO concentrations; (3) localized significance thresholds; (4) mitigation measures and control efficiencies; (5) mobile source toxics analysis; (6) off-road mobile source emission factors; (7) $PM_{2.5}$ significance thresholds and calculation methodology; and (8) updated SCAQMD Air Quality Significance Thresholds. The SCAQMD also recommends using approved models to calculate emissions from land use projects, such as the CalEEMod software, which is a model developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California Air Districts. CalEEMod is a Statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions from a variety of land use projects.

The SCAQMD has published a guidance document called the Final Localized Significance Threshold Methodology for CEQA Evaluations that is intended to provide guidance when evaluating the localized effects from mass emissions during construction.[45] The SCAQMD adopted additional guidance regarding PM2.5 emissions in a document called Final Methodology to Calculate Particulate Matter (PM)2.5 and PM2.5 Significance Thresholds.[46] This latter document has been incorporated by the SCAQMD into its CEQA significance thresholds and Final Localized Significance Threshold Methodology.

[44] SCAQMD, CEQA Air Quality Handbook, April 1993.

[45] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

[46] SCAQMD, Final Methodology to Calculate Particulate Matter (PM)2.5 and PM2.5 Significance Thresholds, 2006.

Consistency with Air Quality Management Plan

The SCAQMD's 2022 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving NAAQS related to these pollutants, including transportation control strategies from SCAG's Connect SoCal 2020 designed to reduce VMT.[47,48] The 2022 AQMP control strategies was developed, in part, based on regional growth projections prepared by SCAG through 2045.[49] For this reason, projects whose growth is consistent with the assumptions used in Connect SoCal 2020 will be deemed to be consistent with, and therefore not conflict with, nor obstruct implementation of the 2022 AQMPs because their growth has already been included in the growth projections utilized in the formulation of the control strategies in the 2022 AQMP. Thus, emissions from projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the 2022 AQMP would not jeopardize attainment of the air pollutant reduction goals identified in the AQMPs even if their emissions exceed the SCAQMD's thresholds of significance.[50] As noted above, the 2022 AQMPs have been adopted by the SCAQMD and CARB. Therefore, this analysis considers whether the Project would be in conflict with the 2022 AQMPs based on the Project's consistency with applicable growth projections and emission control strategies developed for the AQMP. Therefore, this analysis considers whether the Project would conflict with the 2022 AQMP based on the Project's consistency with applicable growth projections and emission control strategies.

Project Construction Emissions Methodology

Construction air quality impacts were assessed based on the incremental increase in emissions compared to baseline conditions. Project construction activities that would have the potential to create regional air quality impacts include the use of heavy-duty construction equipment, such as excavators, backhoes, loaders, tractors, pavers, forklifts, vehicle trips generated by construction workers, vendor trucks, and haul trucks traveling to and from the Project Site and building activities, such as the application of paint and other surface coatings. The Project's daily regional criteria pollutant emissions during construction have been estimated by assuming a conservative scenario for construction activities (i.e., assuming all construction occurs at the earliest feasible date, given that regulatory requirements will improve future emissions associated with fleet, vehicle, and equipment mixes) and applying the mobile source and fugitive dust emissions factors. The emissions have been estimated using the CalEEMod software (Version 2022.1), an emissions inventory software program recommended by the SCAQMD, which incorporates the CARB on-road vehicle EMFAC2021 model. The input values used in this analysis were adjusted to be Project-specific based on CalEEMod default equipment types and the construction schedule based on information provided by the Project's construction representative. When information was unknown, CalEEMod defaults were used. Emissions from off-road equipment and off-road vehicles were estimated through CalEEMod since CalEEMod is based on outputs from the CARB off-road emissions factor (OFFROAD), which is the emissions estimation model developed by CARB and used to calculate emissions from construction activities, including off-road vehicles. CalEEMod default worker trip and vendor truck trip estimates were used. Estimates for concrete truck and haul truck trip estimates were calculated based on information provided by the Project construction representative. Emissions from

47 SCAQMD, 2022 Air Quality Management Plan (AQMP), 2022.

48 While the 2024–2050 RTP/SCS (Connect SoCal 2024) has been released, it has not been incorporated into the AQMP and, therefore, the 2020–2045 RTP remains applicable for purposes of addressing air quality impacts.

49 SCAQMD, 2022 AQMP, 2022.

50 SCAQMD, CEQA Air Quality Handbook, April 1993, p. 12-1.

construction vehicles including worker vehicles, haul trucks, vendor trucks, and concrete trucks were also estimated within of CalEEMod. Haul truck trip estimates were based on excavation volumes obtained from the Project construction representative and 10 cubic yard demolition debris capacity haul trucks for the demolition phase and 10 cubic yard soil capacity haul trucks for the grading/excavation and landscaping phase; truck trip estimates were estimated using 10 cubic yard concrete capacity for concrete trucks. As discussed in Chapter 3, *Project Description*, of this Draft EIR, the Project's construction would comply with the City of Inglewood allowable construction hours. The maximum daily emissions were estimated based on maximum construction activity conditions for heavy-duty off-road construction equipment and on-road mobile sources and do not represent the emissions that would occur every day during Project construction. The maximum daily emissions were compared to the SCAQMD daily regional thresholds of significance. A detailed discussion of the Project's construction phasing and equipment list is available in Appendix C of this Draft EIR.[51]

The localized effects from the on-site portion of construction emissions are evaluated at nearby sensitive receptor locations potentially impacted by the Project according to the SCAQMD's Localized Significance Threshold Methodology.[52] The localized significance thresholds are only applicable to NO_X, CO, PM10, and PM2.5. The SCAQMD has established screening criteria for projects that disturb five acres or less that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. The localized analysis is based on this SCAQMD screening criteria. The screening criteria depend on: (1) the area in which the Project is located SRA, (2) the size of the Project Site, and (3) the distance between the Project Site and the nearest sensitive receptor. The Project Site is located within SCAQMD SRA 3 and is approximately 17.99 acres in size. The nearest off-site air quality sensitive receptors include the residences located within 25 meters of the Project Site to the west and south.[53] The Project's impacts were conservatively evaluated using the maximum thresholds for a 5-acre site and for a sensitive receptor assumed to be located 25 meters from the Project Site.[54]

As stated above, fugitive dust emissions would result from demolition and various soil-handling activities during construction of the Project. Construction contractors are required to comply with the applicable provision of SCAQMD Rule 403 (Fugitive Dust). As discussed in subsection, *Regulatory Framework*, above, SCAQMD Rule 403 requires construction activities to control fugitive dust emissions during construction by complying with best available control measures, such as ensuring sufficient freeboard height for haul vehicles, covering loose material on haul vehicles, applying water or non-toxic soil stabilizers in sufficient quantities to prevent the generation of visible dust plumes on disturbed or unpaved road surfaces, and limiting vehicle speeds to 15 miles per hour on unpaved surfaces. Applicable fugitive

[51] Impacts from asbestos and lead-based paint from Project demolition are expected to be less than significant with compliance with regulations. For additional details please refer to the Project's Initial Study, included in Appendix A-2 of this Draft EIR.

[52] South Coast Air Quality Management District, Localized Significance Thresholds, (2003, revised 2008), http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed April 2025.

[53] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008, page 3-3. "Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters."

[54] Using the screening criteria applicable for a 5-acre site is conservative because the localized significance thresholds are project site dependent and the allowable thresholds increase with increasing project size. Therefore, using a 5-acre site threshold instead of the Project Site's full 17.99 acres yields a more stringent analysis.

dust control measures are incorporated into the construction emissions modeling within the SCAQMD-approved CalEEMod software.

Project construction is expected to occur over approximately 24 months. If construction commences at a later date, construction emissions would be lower than those estimated below due to the use of a more energy-efficient and cleaner burning construction vehicle fleet mix. As a result, should Project construction commence at a later date than analyzed in this Draft EIR, air quality impacts would be lower than the impacts disclosed herein.

Project Operational Emissions Methodology

Project operational emissions were estimated using CalEEMod Version 2022.1 to forecast the daily regional criteria pollutant emissions from on-site area and stationary sources that would occur during long-term Project operations.

Operation of the Project has the potential to generate criteria pollutant emissions through vehicle trips traveling to and from the Project Site. For mobile sources, the estimated daily vehicle trips were provided for the Project uses in the Project's Vehicle Miles Traveled (VMT) Screening Assessment.[55] The Project's operational mobile emissions were estimated using the CalEEMod software. CalEEMod was also used to forecast the daily regional criteria pollutant emissions from on-site areas and stationary sources that would occur during long-term Project operations. Emissions would result from area sources located on-site, such as landscaping equipment, architectural coating, and use of consumer products. The Project is not expected to contain any large stationary combustion equipment, such as large boilers or combustion turbines. CalEEMod generates default natural gas usage factors based on the California Energy Commission (CEC) Electricity Demand Forecast Zone (EDFZ) and based on energy consumption estimates from the CEC's (2020, 2021) 2018–2030 Uncalibrated Commercial Sector Forecast and 2019 Residential Appliance Saturation Survey. The Project would be required to meet the Title 24 standards in effect at the time of building permit application. For example, the Project would be required to comply with the 2025 Title 24 Building Energy Efficiency Standards (which are effective for building permit applications that are applied for on or after January 1, 2026). CalEEMod includes building energy efficiency factors for the 2019 Title 24 Building Energy Efficiency Standards but does not include correction factors for the 2025 standards.[56]

The localized effects from the on-site portion of the maximum daily net emissions from Project operation were evaluated at the nearby sensitive receptor locations that would be potentially impacted by operation of the Project according to the SCAQMD's *Final Localized Significance Threshold Methodology*.[57] The localized impacts from operation of the Project were assessed similar to the construction emissions, as discussed previously. The Project Site is located within SCAQMD SRA 3 is approximately 17.99 acres in size, Therefore, conservatively, the screening criteria used in the analysis were those applicable for a 5-acre site in SRA 3 with sensitive receptors within 25 meters away, which accounts for all adjacent off-site

[55] LLG Consulting, Inc. 2025. Vehicle Miles Traveled Screening Assessment, September 2025. Provided in Appendix I of this Draft EIR

[56] This would be considered conservative because the Project would be required to comply with newer and more stringent 2025 Title 24 standards compared to the default 2019 Title 24 standards incorporated in CalEEMod version 2022.1.

[57] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

sensitive receptors.[58,59] For further explanation, please see the *Air Quality and Greenhouse Gas Emissions Technical Documentation* in Appendix C of this Draft EIR.

As discussed above, the existing site is currently developed with the existing Inglewood High School. The primary campus development is situated in the eastern portion of campus, and consists of classroom and administrative buildings. Athletic courts and fields are located on the western portion of the campus. The Project includes demolition of majority of the buildings on site, repair of several buildings, and site improvements to the campus. As described above, in order to provide a conservative analysis, no credit is taken for existing operational AQ emissions and the Project's air quality emissions are conservatively considered new.

Operational impacts were assessed for the full Project buildout year (i.e., as early as 2028 assuming construction begins at the earliest possible time in 2026). If the onset of Project operations is delayed to a later date than assumed in the modeling analysis, operational impacts would be less than those analyzed here in 2028 due to the improving vehicle technology that would be more fuel-efficient and lead to a cleaner vehicle fleet mix traveling to and from the Project Site. As a result, Project buildout at a later date than analyzed in emissions modeling would result in air quality emission impacts that would be lower than the impacts disclosed herein.

Carbon Monoxide Hotspots

Emissions of CO are generated in greatest quantities from motor vehicle combustion of fossil fuels and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. Localized areas where ambient concentrations exceed State and/or federal standards are termed CO hotspots. The potential for the Project to cause or contribute to the formation of offsite CO hotspots are evaluated based on prior dispersion modeling of the four busiest intersections in the Air Basin that has been conducted by SCAQMD for its CO Attainment Demonstration Plan in the conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin that include: Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; La Cienega Boulevard and Century Boulevard; and Long Beach Boulevard and Imperial Highway.[60] In the 2003 AQMP, SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of approximately 100,000 vehicles per day. This intersection is located near the on- and off-ramps to Interstate (I) 405 in Westwood. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day. The AQMP CO hotspots modeling also took into account worst-case meteorological conditions and background CO concentrations. As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. If a project would potentially result in a CO hotspot based on the initial screening,

[58] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008, page 3-3. "Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters."

[59] Using the screening criteria applicable for a 5-acre site is conservative because the localized significance thresholds are project site dependent and the allowable thresholds increase with increasing project size. Therefore, using a 5-acre site threshold instead of the Project Site's full 17.99 acres yields a more stringent analysis.

[60] The 2003 AQMP is the most current AQMP that provides modeling and attainment demonstration for CO.

detailed modeling may be performed using California LINE Source Dispersion Model, version 4 (CALINE4), which is a model used to assess air quality impacts near transportation facilities (i.e., roadways, intersections, street canyons, and parking facilities).

Toxic Air Contaminants Impacts

The SCAQMD has also adopted land use planning guidelines in the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, which considers impacts to sensitive receptors from facilities that emit TAC emissions. SCAQMD's siting distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity to freeways and high-traffic roads, and the same siting criteria for distribution centers and dry-cleaning facilities). The SCAQMD's document introduces land use-related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

Construction

The greatest potential for TAC emissions during construction would be related to DPM emissions associated with heavy-duty equipment during demolition, excavation and grading activities. Construction activities associated with the Project would be sporadic, transitory, and short term in nature (approximately 24 months). Although Project construction would be temporary, construction impacts associated with TACs are addressed quantitatively in a refined HRA. OEHHA is responsible for developing and revising guidelines for performing health risk assessments (HRAs) under the State's Air Toxics Hot Spots Program Risk Assessment (AB 2588) regulation. In March 2015, OEHHA adopted revised guidelines that update the previous guidance by incorporating advances in risk assessment with consideration of infants and children using Age Sensitivity Factors (ASF). The construction HRA was performed in accordance with the revised OEHHA Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA Guidance).[61] The analysis incorporates the estimated construction emissions, as previously discussed, and dispersion modeling using the USEPA AERMOD model with meteorological data from the closest SCAQMD monitoring station.

The maximum daily construction emissions were estimated for each construction phase and the overlapping phases. However, these emissions would not represent the emissions that would occur for every day of construction. Therefore, to account for the average construction usage, for the construction HRA, the average daily equipment fleet and usage hours was provided by the Project's construction representative and average daily emissions of each construction phase were applied in the construction HRA. Detailed calculations can be found in Appendix C of this Draft EIR

Operations

During long-term operations, TACs could be emitted as part of periodic maintenance operations, from routine cleaning, from periodic painting, etc., and from periodic visits from delivery trucks and service vehicles, and from maintenance. However, these events are expected to be occasional and result in minimal emissions exposure to off-site sensitive receptors. As the Project consists only of educational high school uses, the Project would not include sources of substantial TAC emissions identified by the

[61] California Environmental Protection Agency, Office of Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, 2015.

SCAQMD or CARB siting recommendations.[62, 63] For operations, the impacts are analyzed qualitatively due to the limited and minimal sources of TACs associated with operation of the proposed land uses.

Analysis of Project Impacts

Threshold AIR-1: The Project would result in a significant impact if it would conflict with or obstruct the implementation of the applicable air quality plan.

Impact Analysis

Consistency with Air Quality Plan

SCAQMD CEQA Air Quality Handbook Policy Analysis

The following analysis addresses the Project's consistency with applicable SCAQMD and SCAG policies, inclusive of regulatory compliance. In accordance with SCAQMD's CEQA Air Quality Handbook, Chapter 12, the following criteria are required to be addressed to determine the Project's consistency with applicable SCAQMD and SCAG policies:

- Criterion 1: Will the Project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations; or
  - Cause or contribute to new air quality violations; or
  - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Criterion 2: Will the Project exceed the assumptions utilized in preparing the AQMP
  - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
  - Does the Project include air quality mitigation measures; or
  - To what extent is Project development consistent with the AQMP control measures?

The Project's potential impacts with respect to these criteria are discussed to assess the consistency with the SCAQMD's 2022 AQMP and other applicable plans and policies.

Criterion 1

With respect to the first criterion, as discussed under the analysis for Threshold AIR-3 below, localized concentrations of NO_2 as NO_X, CO, PM10, and PM2.5 have been analyzed for the Project. SO_2 emissions would be negligible during construction and long-term operations and, therefore, would not have the potential to cause or effect a violation of the SO_2 ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. However, due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

[62] SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, 2005, Table 2-3.

[63] CARB, Air Quality and Land Use Handbook: A Community Health Perspective, 2005, Table 1-1.

The Project's NO_X, CO, PM10, and PM2.5 emissions during construction and operations were analyzed: (1) to ascertain potential effects on localized concentrations; and (2) to determine if there is a potential for such emissions to cause or effect a violation of the ambient air quality standards for NO_2, CO, PM10, and PM2.5. As shown in Table 4.2-7, the increases in localized emissions of NO_2, CO, PM10, and PM2.5 during construction would not exceed the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site. As shown in Table 4.2-8, the increases in localized emissions of NO_X, CO, PM10, and PM2.5 emissions during operation of the Project would not exceed the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site.

The 2022 AQMP is the current SCAQMD-adopted management plan for continued progression toward clean air and compliance with State and federal requirements (it is not yet adopted by the USEPA for inclusion in the State Implementation Plan). It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources, and area sources. It builds upon measures already in place from previous AQMPs and includes a variety of new strategies (e.g., regulation, accelerated deployment of available cleaner technologies, best management practices, co-benefits from existing programs, incentives, etc.) to achieve the NAAQS. The Project would be required to comply with all new and existing regulatory measures set forth by the SCAQMD so as not to potentially increase the frequency or severity of an existing violation or cause or contribute to a new violation. Implementation of the Project would not interfere with air pollution control measures listed in the 2022 AQMP and therefore would not delay attainment of the air quality standards.

The Project would not introduce any substantial stationary sources of emissions; therefore, CO is the appropriate benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations.[64] As indicated below in Threshold 3, no intersections would result in a CO hotspot in excess of the ambient air quality standards, and impacts would be less than significant. Therefore, the Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.

Therefore, in response to Criterion 1, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for ozone. Impacts regarding the timely attainment of air quality standards or interim emission reductions specified in the AQMP and impacts would be less than significant.

Criterion 2

With respect to the second criterion for determining consistency with 2022 AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2020-2045 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the 2022 AQMP involves the evaluation of consistency with applicable population, housing, and employment growth projections and appropriate incorporation of 2022 AQMP control measures. The following discussion provides an analysis with respect to these criteria.

[64] SCAQMD, CEQA Air Quality Handbook, Chapter 12, Assessing Consistency with Applicable Regional Plans, April 1993.

Air Quality Management Plan Consistency

As discussed above, the SCAQMD has adopted a series of AQMPs to lead the Air Basin into compliance with several criteria pollutant standards and other federal requirements.

The Project would not obstruct implementation of the 2022 AQMP for, as discussed below, its construction and operational emissions would be less than significant. The Project would comply with applicable required fleet rules and control strategies to reduce on-road truck emissions (i.e., 13 CCR, Section 2025 [CARB Truck and Bus regulation]), and other applicable SCAQMD rules specified and incorporated in the 2022 AQMP. As discussed above in *Methodology*, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the 2022 AQMP would not jeopardize attainment of the air quality levels identified in the 2022 AQMP.

With respect to the determination of consistency with the 2022 AQMP growth assumptions, the projections in the 2022 AQMP for achieving air quality goals are based on assumptions in the SCAG 2020–2045 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies.

Construction

Control Strategies

During its construction phase, the Project would ensure compliance with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment, and with SCAQMD's regulations such as Rule 403 for controlling fugitive dust and Rule 1113 for controlling VOC emissions from architectural coatings. Furthermore, as described in Mitigation Measure AQ-1, the Project would utilize off-road diesel equipment greater than 25 hp that meet USEPA Tier 4 Final off-road emission standards and electrified air compressors, generators and tower cranes in place of diesel-fueled equipment. In addition, the Project's compliance with the City's General Plan Environmental Justice Element Policy EJ-2.27 promotes the local enforcement the State's idling limits which would reduce any unnecessary idling and associated emissions. Compliance with these features and requirements would be consistent with and meets or exceeds the 2022 AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

Growth Projections

The Project would generate short-term construction jobs, but these jobs would not necessarily bring new construction workers or their families into the region, since construction workers are typically drawn from an existing regional pool who travel among construction sites within the region. Construction workers are not typically brought from other regions to work on developments such as the Project. Moreover, these jobs would be relatively small in number and temporary in nature. Therefore, the Project's construction jobs would not conflict with the long-term employment or population projections upon which the 2022 AQMP forecasted emission levels are based.

Operations

Control Strategies and Policy Consistency

The Project design and land uses render it consistent with the 2022 AQMP during operations. As discussed above, the 2022 AQMP includes transportation control strategies from the 2020-2045 RTP/SCS

that are intended to reduce VMT and resulting regional mobile source emissions. The majority of these strategies are to be implemented by cities, counties, and other regional agencies such as SCAG and SCAQMD, although some can be furthered by individual development projects.

The Proposed Project would not increase planned student capacity but was estimated to have a potential net increase in 40 staff members from existing conditions. However, the Project involves reconstruction of Inglewood High School, which will continue to serve local students, faculty, and community members, and would provide improvements to serve the 1,200-student capacity, for which the school is currently designed. Additionally, the Project would not result in any changes to the existing land use at the Project Site, as operations would be consistent to that of the existing campus. The Project location would support land use and transportation control strategies related to reducing vehicle trips for students, employees and visitors by increasing educational land uses and community recreational uses associated use density near public transit. The Project is considered a reconstruction project, as it redevelops the existing Inglewood High School within an already developed urban area. The Project is accessible to and well served by public transit including frequent and comprehensive transit services. Specifically, the Project is located in an urban setting and is well served by a network of regional transportation facilities. The Project Site is within walking distance of the existing bus stops located along Manchester Boulevard, east and west of Grevillea Avenue, and along Eucalyptus Avenue at Kelso Street. Therefore, the Project would be consistent with the 2022 AQMP's goal of reducing mobile source emissions as a source of NO_X and PM2.5. Thus, Project development is consistent with the 2022 AQMP with respect to transportation control strategies from the 2020-2045 RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions.

Furthermore, as mentioned in the Project Description, the Project Site is zoned as Civic Center (C-C) and the Proposed Project would not alter the zoning designation. According to the City of Inglewood General Plan, the Project Site has a land use designation of Civic Center (C-C), which is consistent with its use as a school. The C-C district allows government offices, schools and other public facilities, as well as limited private office and retail. By state law, public school facilities can be exempted from local zoning ordinances consistent with California Government Code Section 53094.

Based on the above, the Project is consistent with the criteria identified in SCAQMD's CEQA Air Quality Handbook and would not conflict with or obstruct the implementation of the 2022 AQMP. Impacts related to the 2022 AQMP would be less than significant.

As described above, by redeveloping the existing high school that is located within an area that has existing high quality public transit (with access to existing local bus service) and housing all within walking distance, and by including features that support and encourage pedestrian activity and other non-vehicular transportation and increased transit use in the City, the Project would reduce vehicle trips and VMT, and resulting air pollutant emissions.

Growth Projections

The Project is anticipated to be fully operational in 2028. The Project's growth would be consistent with the growth projections contained in the 2020-2045 RTP/SCS, which forms the basis of the growth projections in the 2022 AQMP.

Based on the 2020–2045 RTP/SCS growth projections, the Project would result in an increase in the number of employees on the Project Site of approximately 40 new employees, which would comprise approximately 0.3 percent of SCAG's estimated increase of 12,100 employees within the City between 2016 and 2045.[65] Furthermore, the Proposed Project would not increase school enrollment capacity. Rather, the Project involves reconstruction of Inglewood High School, which will continue to serve local students, faculty, and community members, including through use of recreational amenities such as playing fields and courts. The Project's contribution to employment would be consistent with SCAG's 2020-2045 RTP/SCS goals, as well as the 2020-2045 RTP/SCS employment projections for the City that the growth projections in the 2022 AQMP are based on. Projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the 2022 AQMP would not jeopardize attainment of the air quality reductions identified in the 2022 AQMPs.[66] As a result, the Project would not conflict with the growth projections used in the development in the 2022 AQMP. Impacts would be less than significant.

Based on the above, the Project is consistent with the criteria identified in SCAQMD's CEQA Air Quality Handbook and would not conflict with or obstruct the implementation of both the 2022 AQMP. Therefore, Project impacts related to the 2022 AQMP would be less than significant.

General Plan Air Quality-Related Policies

As discussed above, the City of Inglewood General Plan Environmental Justice Element includes a goal relevant to air pollutant emissions. Several policies, including EJ-2.4, EJ-3.1, EJ-3.2, EJ-3.3, and EJ-3.4 promote active transportation and transit use. The Project would provide 32 bicycle parking spaces and 8 covered staff bicycle parking spaces, and is located adjacent to several bus stops which includes the Metro bus 115 and bus 211/215. Furthermore, the Project Site would include pedestrian circulation improvements that would improve walkability on-site through upgraded sidewalks, barrier-free pathways, ADA-compliant entries, and improved lighting and landscaping. These features encourage non-vehicular modes of transportation and would help reduce transportation-related criteria air pollutant emissions. Furthermore, the Project's location and design align with the City's goals of increasing active and sustainable travel. The Project would also be consistent with Policy EJ-2.8, which relates to the reduction of VMT to reduce emissions. The Project would redevelop an existing school site, located within an already built environment and in close proximity to existing transit stops and downtown Inglewood amenities. These features would reduce reliance on single-occupancy vehicles and the associated air pollutant emissions. Additionally, the Project would include 25 EV parking spaces, including 6 with charging stations, and would further reduce transportation emissions. Therefore, the Project would be consistent with the Environmental Justice Element's goals.

For these reasons, the Proposed Project would be consistent with City's General Plan policies related to air quality.

Mitigation Measures

No mitigation measures are required.

[65] LLG Consulting, Inc. 2025. Vehicle Miles Traveled Screening Assessment, September 2025. Provided in Appendix H of this Draft EIR.

[66] SCAQMD, CEQA Air Quality Handbook, page 12-1.

Level of Significance After Mitigation

Not applicable. Impacts regarding consistency with the applicable air quality plan would be less than significant.

Threshold AIR-2: The Project would result in significant impact if it would 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.

Impact Analysis

Cumulatively Considerable Non-Attainment Pollutants

Construction Emissions

Construction of the Project has the potential to generate temporary regional criteria pollutant emissions through the use of heavy-duty construction equipment, such as backhoes and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the site and through building activities such as the application of paint and other surface coatings. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions.

The maximum daily construction emissions for the Project were estimated for each construction phase and the overlapping phases. The maximum daily emissions are predicted values for a representative worst-case day, and do not represent the actual emissions that would occur for every day of construction, which would likely be lower on many days. As stated above, in order to provide a conservative emissions analysis, for modeling purposes, construction emissions were modeled beginning in 2026. Detailed emissions calculations are provided in Appendix C of this Draft EIR.

The results of the criteria pollutant calculations are presented in **Table 4.2-4**. Emissions include dust control measures required by SCAQMD Rule 403 (Control of Fugitive Dust) and fugitive VOC control measures to be implemented by architectural coating emission factors required by SCAQMD Rule 1113 (Architectural Coatings).

Operational Emissions

Operational criteria pollutant emissions were calculated for mobile, area, and stationary sources for the Project's operational year, 2028. Operations would adhere to the applicable codes including 2025 Title 24 Green Building Code. Operational emission estimates include compliance with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content of architectural coatings. Detailed emissions calculations are provided in Appendix C of this Draft EIR.

TABLE 4.2-4
ESTIMATED MAXIMUM UNMITIGATED REGIONAL CONSTRUCTION EMISSIONS (POUNDS PER DAY)[a]

Pollutants	VOC	NOX	CO	SO2	PM10[b]	PM2.5[b]
Individual Phases						
Site Improvements – Utilities 2026	2.87	16.26	42.87	0.06	8.57	2.29
Site Improvements – Demolition 2026	2.43	29.03	22.89	0.08	6.19	1.93
Site Improvements – Grading 2026	3.19	34.98	31.60	0.11	5.81	2.66
Site Improvements – Electrical Service Yard 2026	0.17	1.63	2.98	0.00	0.13	0.07
New Build – Building Construction 2026	1.49	11.52	17.17	0.03	1.62	0.64
Repair – Building Construction 2026	3.85	4.80	7.77	0.01	0.67	0.26
New Build – Architectural Coating 2026	12.23	5.21	7.83	0.01	0.35	0.18
New Build – Architectural Coating 2027	12.18	5.06	7.57	0.01	0.32	0.15
New Build – Building Construction 2027	1.43	11.05	16.74	0.03	1.58	0.61
Site Improvements – Architectural Coating 2027	2.23	1.26	7.13	0.00	1.33	0.32
Site Improvements – Landscaping 2027	3.06	28.63	29.61	0.08	4.40	2.19
Site Improvements – Paving 2027	0.88	8.66	11.54	0.02	0.90	0.44
Overlapping Phases						
Site Improvements – Utilities 2026 + Site Improvements – Demolition 2026	5.29	45.29	65.76	0.14	14.77	4.22
Site Improvements- Utilities 2026 + Site Improvements - Demolition 2026 + Site Improvements – Grading 2026	8.49	80.27	97.36	0.25	20.57	6.88
Site Improvements – Utilities 2026 + Site Improvements – Grading 2026+ Site Improvements - Electrical Service Yard 2026	6.23	52.86	77.44	0.17	14.51	5.02
Site Improvements – Utilities 2026 + Site Improvements – Grading 2026+ Site Improvements - Electrical Service Yard 2026 + New Build - Building Construction 2026	7.72	64.38	94.61	0.20	16.13	5.67
Site Improvements – Utilities 2026 + Site Improvements - Electrical Service Yard 2026 + New Build - Building Construction 2026 + New Build – Architectural Coating 2026	16.75	34.61	70.84	0.10	10.67	3.18
Site Improvements – Utilities 2026 + Site Improvements - Electrical Service Yard 2026 + New Build - Building Construction 2026 + New Build – Architectural Coating 2026 + Repair - Building Construction 2026	20.60	39.42	78.61	0.12	11.34	3.44
Site Improvements - Electrical Service Yard 2026 + New Build - Building Construction 2026 + New Build – Architectural Coating 2026 + Repair - Building Construction 2026	17.73	23.16	35.74	0.06	2.77	1.15
New Build - Building Construction 2026 + New Build – Architectural Coating 2026 + Repair - Building Construction 2026	17.56	21.53	32.77	0.05	2.64	1.08
New Build - Building Construction 2026 + New Build – Architectural Coating 2026	13.71	16.73	25.00	0.04	1.97	0.82
New Build - Building Construction 2027 + New Build – Architectural Coating 2027	13.61	16.11	24.30	0.04	1.90	0.76

Pollutants	VOC	NOX	CO	SO2	PM10[b]	PM2.5[b]
New Build - Building Construction 2027 + New Build – Architectural Coating 2027 + Site Improvements - Architectural Coating 2027 + Site Improvements – Landscaping 2027+ Site Improvements – Paving 2027	19.78	54.66	72.59	0.14	8.52	3.71
New Build - Building Construction 2027 + Site Improvements -Architectural Coating 2027 + Site Improvements – Landscaping 2027+ Site Improvements – Paving 2027	7.59	49.60	65.02	0.13	8.20	3.56
Maximum Daily Regional Emissions	20.60	80.27	97.36	0.25	20.57	6.88
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Notes:
Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C.
Source: ESA 2025

Daily trip generation rates for the Project were provided by the Project's VMT Screening Assessment for the Project prepared by LLG Consulting, Inc, dated September 18, 2025, included as Appendix H of this Draft EIR. The Project is forecast to generate approximately 1,536 daily weekday trips. Saturday trips are estimated at 2,392 total daily trips, primarily associated with the new recreational facilities, including playing fields, basketball courts, and tennis courts, as well as the net increase of 40 staff members.[67] Natural gas usage factors are based on recreational and retail data from the CEC, and landscape equipment emissions are based on off-road emission factors from CARB as incorporated in CalEEMod. Emissions from the use of consumer products and the reapplication of architectural coatings are based on default data provided in CalEEMod. As discussed previously, in order to provide a conservative analysis, no credit is taken for existing operational AQ emissions and the Project's air quality emissions are conservatively considered new.

The results of the regional criteria pollutant emission calculations for VOC, NO_X, CO, SO_2, PM10, and PM2.5 are presented in **Table 4.2-5**. The Project's operational-related daily emissions would not exceed the SCAQMD numeric indicators for any criteria pollutants. As the Project's maximum regional emissions from operational activities would be below the regional numeric indicators, regional operational emissions impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Not applicable. Impacts regarding cumulatively considerable net increase of any criteria pollutant would be less than significant.

[67] LLG Consulting, Inc. 2025. Vehicle Miles Traveled Screening Assessment, September 2025. Provided in Appendix H of this Draft EIR

TABLE 4.2-5
ESTIMATED MAXIMUM UNMITIGATED REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY)[a]

Source	VOC	NOX	CO	SO2	PM10	PM2.5
Motor Vehicles	8.33	5.29	55.51	0.13	12.08	3.12
Area (Coating, Consumer Products, Landscaping)	8.02	0.09	10.91	0.00	0.02	0.01
Energy	0.08	1.41	1.19	0.01	0.11	0.11
Project Maximum Daily Operational Emissions	**16.43**	**6.80**	**67.61**	**0.14**	**12.21**	**3.24**
SCAQMD Significance Threshold	55	55	550	150	150	55
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
a. Totals may not add up exactly due to rounding in the modeling calculations.
Source: ESA 2025

Threshold AIR 3 Expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis

Substantial Pollutant Concentrations

Localized Construction Emissions

As explained above, the localized construction air quality analysis was conducted using the methodology prescribed in the SCAQMD *Final Localized Significance Threshold Methodology* (June 2003, revised July 2008).[68] The screening criteria provided in the *Final Localized Significance Threshold Methodology* were used to determine localized construction emissions thresholds for the Project. The maximum daily localized emissions for each of the construction phases and the localized significance thresholds are presented in **Table 4.2-6**. The same phasing, equipment assumptions, and compliance with SCAQMD Rule 403 and Rule 1113, were used as for the regional emissions calculations discussed above. As shown in Table 4.2-6, maximum localized construction emissions for sensitive receptors would be below the localized screening indicators for NO_X, CO, PM10, and PM2.5, therefore, with respect to localized construction emissions, impacts to sensitive receptors would not be potentially significant. As the Project's maximum localized construction emissions would not exceed the localized numeric indicators for NO_X, CO, PM10, and PM2.5, its construction emissions impacts to sensitive receptors would be less than significant.

[68] SCAQMD, Final Localized Significance Threshold Methodology.

TABLE 4.2-6
ESTIMATED MAXIMUM UNMITIGATED LOCALIZED CONSTRUCTION EMISSIONS (POUNDS PER DAY)[a]

Pollutants	NOX	CO	PM10	PM2.5
Individual Phases				
Site Improvements – Utilities 2026	7.03	7.31	0.27	0.25
Site Improvements – Demolition 2026	20.65	19.01	3.90	1.24
Site Improvements – Grading 2026	27.23	27.57	3.54	1.99
Site Improvements – Electrical Service Yard 2026	1.54	2.68	0.06	0.05
New Build – Building Construction 2026	10.11	11.76	0.36	0.33
Repair – Building Construction 2026	4.23	5.50	0.14	0.13
New Build – Architectural Coating 2026	5.14	6.80	0.14	0.13
New Build – Architectural Coating 2027	4.99	6.75	0.11	0.11
New Build – Building Construction 2027	9.70	11.70	0.32	0.30
Site Improvements – Architectural Coating 2027	0.83	1.13	0.02	0.02
Site Improvements – Landscaping 2027	25.58	27.28	3.44	1.91
Site Improvements – Paving 2027	6.94	9.95	0.30	0.27
Overlapping Phases				
Site Improvements – Utilities 2026 + Site Improvements – Demolition 2026	27.69	26.32	4.17	1.49
Site Improvements- Utilities 2026 + Site Improvements - Demolition 2026 + Site Improvements – Grading 2026	54.91	53.89	7.71	3.47
Site Improvements – Utilities 2026 + Site Improvements – Grading 2026+ Site Improvements - Electrical Service Yard 2026	35.80	37.57	3.87	2.29
Site Improvements – Utilities 2026 + Site Improvements – Grading 2026+ Site Improvements - Electrical Service Yard 2026 + New Build - Building Construction 2026	45.91	49.33	4.23	2.62
Site Improvements – Utilities 2026 + Site Improvements - Electrical Service Yard 2026 + New Build - Building Construction 2026 + New Build – Architectural Coating 2026	23.82	28.56	0.83	0.76
Site Improvements – Utilities 2026 + Site Improvements - Electrical Service Yard 2026 + New Build - Building Construction 2026 + New Build – Architectural Coating 2026 + Repair - Building Construction 2026	28.06	34.06	0.97	0.89
Site Improvements - Electrical Service Yard 2026 + New Build - Building Construction 2026 + New Build – Architectural Coating 2026 + Repair - Building Construction 2026	21.02	26.74	0.70	0.64
New Build - Building Construction 2026 + New Build – Architectural Coating 2026 + Repair - Building Construction 2026	19.48	24.06	0.64	0.59
New Build - Building Construction 2026 + New Build – Architectural Coating 2026	15.25	18.56	0.50	0.46
New Build - Building Construction 2027 + New Build – Architectural Coating 2027	14.68	18.46	0.44	0.40
New Build - Building Construction 2027 + New Build – Architectural Coating 2027 + Site Improvements -Architectural Coating 2027 + Site Improvements – Landscaping 2027+ Site Improvements – Paving 2027	48.04	56.82	4.19	2.60

Pollutants	NOX	CO	PM10	PM2.5
New Build - Building Construction 2027 + Site Improvements - Architectural Coating 2027 + Site Improvements – Landscaping 2027+ Site Improvements – Paving 2027	43.05	50.06	4.08	2.50
Maximum	**54.91**	**56.82**	**7.71**	**3.47**
SCAQMD Screening Numeric Indicator [c]	109.0	1,796.0	15.0	8.0
Exceeds Threshold?	**No**	**No**	**No**	**No**

Notes:
a. Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C.
b. Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.
c. The SCAQMD LSTs are based on Source Receptor Area 3 (Southwest Coastal LA County County) where thresholds were conservatively used for a 5-acre site with sensitive receptors conservatively assumed to be located adjacent to the construction area.
Source: ESA 2025

Localized Operational Emissions

The screening criteria provided in the Localized Significance Threshold Methodology were used to determine the localized operational emissions numerical indicators of significance for the Project. The same assumptions, including compliance with the 2025 Title 24 building energy efficiency standards, and 2025 CALGreen Code, were used in the analysis. The maximum daily localized emissions and the localized significance thresholds are presented in **Table 4.2-7**. As the Project's maximum localized operational emissions would not exceed the localized numeric indicators for NO_X, CO, PM10, or PM2.5, operational emissions impacts to sensitive receptors would be less than significant.

TABLE 4.2-7
ESTIMATED MAXIMUM UNMITIGATED LOCALIZED OPERATIONAL EMISSIONS (POUNDS PER DAY)[a]

Source	NO_X	CO	PM10	PM2.5
Area (Coating, Consumer Products, Landscaping)	0.09	10.91	0.02	0.01
Energy (Natural Gas)	1.41	1.19	0.11	0.11
Total Project On-Site Emissions	**1.51**	**12.10**	**0.13**	**0.12**
SCAQMD Screening Numeric Indicator [b]	109.0	1796.0	4.0	2.0
Exceeds Thresholds?	No	No	No	No

Notes:

a. Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C.
c. The SCAQMD LSTs are based on Source Receptor Area 3 (Southwest Coastal LA County County) where thresholds were conservatively used for a 5-acre site with sensitive receptors conservatively assumed to be located adjacent to the construction area.

Source: ESA 2025

Carbon Monoxide Hotspots

The potential for the Project to cause or contribute to CO hotspots was evaluated by comparing Project intersections (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs and considering existing background CO concentrations. As discussed below, this comparison demonstrates that the Project would not cause or contribute considerably to the formation of CO hotspots, that CO concentrations at Project-impacted intersections would remain well below the threshold one-hour and eight-hour ambient air quality standards (CAAQS)

of 20 or 9.0 parts per million (ppm), respectively within one-quarter mile of a sensitive receptor, and that no further CO analysis is warranted or required.

As shown previously in Table 4.2-2, CO levels in the Project Site area are substantially below the Federal and the State standards. Maximum CO levels in recent years were 1.8 ppm (one-hour average) and 1.6 ppm (eight-hour average) as compared to the criteria of 20 ppm (CAAQS one-hour average) or 35 ppm (NAAQS one-hour average) and 9.0 ppm (eight-hour average). No exceedances of the CO standards have been recorded at monitoring stations in the Air Basin for some time,[69] and the Air Basin is currently designated as a CO attainment area for both the CAAQS and the NAAQS.

The SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin. These include: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; and (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP CO attainment demonstration, the SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day.[70] This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions (i.e., excluding background concentrations) at these four intersections was 4.6 ppm (one-hour average) and 3.2 ppm (eight-hour average) at Wilshire Boulevard and Veteran Avenue.[71] Therefore, projects that result in traffic at any intersection of less than 100,000 vehicles per day would be considered to be less than significant.

Based on the Project's VMT Assessment, under the Future with Project Conditions (2028), the intersection of Inglewood Avenue and Manchester Boulevard would have a maximum traffic volume of approximately 26,810 average daily trips under the Project buildout scenario.[72]As the Project does not result in 100,000 vehicles per day at any study area intersection, this comparison demonstrates that the Project would not contribute to the formation of CO hotspots and that no further CO analysis is required. The Project would not contribute to the formation of CO hotspots and no further CO analysis is required. Therefore, the Project would result in less than significant impacts with respect to CO hotspots.

Toxic Air Contaminants

Construction

The Project's health risk calculations were performed using a spreadsheet tool consistent with the OEHHA guidance, which incorporates the algorithms, equations, and a variable described above as well as in the OEHHA guidance, and incorporates the results of the AERMOD dispersion model. As shown in **Table 4.2-8**, unmitigated results of the HRA cancer risk for residential land uses exceed the SCAQMD significance threshold of 10 per million; therefore, this impact is potentially significant, and mitigation would be required. Also, as seen in Table 4.2-9, the HRA cancer risk for school land uses does not exceed the SCAQMD significance threshold of 10 per million Hazard index values for all receptor types were

69 SCAQMD, Final 2012 AQMP, page 2-22.

70 SCAQMD, 2003 AQMP, Appendix V: Modeling and Attainment Demonstrations, page V-4-24.

71 The eight-hour average is based on a 0.7 persistence factor, as recommended by the SCAQMD.

72 LLG Consulting, Inc. 2025. Vehicle Miles Traveled Screening Assessment, September 2025. Provided in Appendix I of this Draft EIR.

below the SCAQMD significance threshold of 1.0, therefore, chronic impacts would be less than significant.

TABLE 4.2-8
MAXIMUM UNMITIGATED HEALTH RISK IMPACTS FOR OFF-SITE SENSITIVE AND COMMERCIAL RECEPTORS

Sensitive Receptor	Maximum Cancer Risk (# in one million)	Hazard Index
Residential Land Use	59.20	0.11
School Land Use (Ages 2+)	3.65	0.04
School Land Use (Ages <2)	1.87	<0.01
Maximum Health Impact Thresholds	10	1.0
Exceeds Threshold?	**Yes**	No

Source: ESA, 2025

Operation

The SCAQMD recommends that operational health risk assessments be conducted for substantial sources of operational DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[73] Project operations would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance activities that would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, Project trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_X emissions from existing diesel trucks. Therefore, Project operations would not be considered a substantial source of diesel particulates.

In addition, the Project would not have any stationary sources associated with the operation of land uses. The Project's operation may involve the use of architectural coatings and other products. The use of consumer products and architectural coatings associated with the Project would be expected to generate minimal emissions from these sources. The Project's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled, and would not be expected to exceed the SCAQMD numerical indicator of significance.

Thus, operation of the Project would not expose sensitive receptors to substantial toxic air contaminant concentrations and operational impacts would be less than significant.

[73] SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, August 2003, http://www.aqmd.gov/docs/default-source/ceqa/handbook/mobile-source-toxics-analysis.doc?sfvrsn=2.

Mitigation Measures

MM-AQ-1: Construction Equipment. The Applicant shall implement the following requirements for construction equipment operating at each Project site. These requirements shall be included in applicable bid documents and contractor(s) must demonstrate the ability to supply such equipment. Construction equipment shall include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 25 horsepower (hp) or greater during Project construction where available within the Air Basin. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent. A copy of each unit's certified tier specification, BACT documentation, and CARB or Southern California Air Quality Management District (SCAQMD) operating permit at the time of mobilization of each applicable unit of equipment shall be provided.

Level of Significance After Mitigation

As shown in **Table 4.2-9**, with implementation of Mitigation Measure AQ-1 (MM-AQ-1) as described below, the maximum cancer risk and hazard index for residential receptors would be below the SCAQMD significance thresholds. Therefore, the impact related to health risks would be less than significant with mitigation. The calculated cancer risk is estimated for outdoor exposure and assumes that sensitive receptors (residential uses) would not have any mitigation such as mechanical filtration and that residential uses would have continuously open windows. As shown in Table 4.2-8 and 4.2-9, maximum cancer risk and hazard index for school and medical/commercial receptors would be below the SCAQMD significance thresholds without mitigation, but would be further reduced with the implementation of Mitigation Measure AQ-1 (MM-AQ-1). As the maximum cancer risk and non-cancer impacts would be less than the SCAQMD significance thresholds, impacts would be less than significant.

TABLE 4.2-9
MAXIMUM MITIGATED HEALTH RISK IMPACTS FOR OFF-SITE SENSITIVE RECEPTORS

Sensitive Receptor	Maximum Cancer Risk (# in one million)	Hazard Index
Residential Land Use	1.55	<0.01
School Land Use (Ages 2+)	0.11	<0.01
School Land Use (Ages <2)	0.11	<0.01
Maximum Health Impact Thresholds	10	1.0
Exceeds Threshold?	No	No

Source: ESA, 2025

The process of assessing health risks and impacts includes a degree of uncertainty, which is dependent on the availability of data and the extent to which assumptions are relied upon in cases where the data are incomplete or unknown. All HRAs rely upon scientific studies to reduce the level of uncertainty; however, it is not possible to completely eliminate uncertainty from the analysis. Where assumptions are used to substitute for incomplete or unknown data, it is standard practice in performing HRAs to err on

the side of health protection to avoid underestimating or underreporting the risk to the public by assessing risk on the most sensitive populations, such as children and the elderly. As shown in Table 4.2-9, cancer risk for nearby residential receptors would remain below significance thresholds with the implementation of Mitigation Measure AQ-1. Furthermore, as described above, the maximum cancer risk and hazard index for school and commercial receptors would be below the SCAQMD significance thresholds without mitigation, but would be further reduced with the implementation of Mitigation Measure AQ-1 (MM-AQ-1). These short-term emissions would not substantially contribute to a significant construction health risk. No residual emissions and corresponding individual cancer risk are anticipated after Project construction. Thus, construction activities would not expose sensitive and commercial receptors to substantial toxic air contaminant concentrations, and construction-related health impacts would be mitigated to less than significant with Implementation of Mitigation Measure AQ-1. Therefore, no additional mitigation measures are required or included, and the impact level would remain less than significant with mitigation.

Cumulative Impacts

Chapter 3, *Environmental Setting*, of this Draft EIR, there are seven related projects identified in the vicinity of the Project Site. The related projects within approximately 1,000 feet of the Project Site are listed in **Table 4.2-10**.

TABLE 4.2-10
RELATED PROJECTS WITHIN 1,000 FEET OF THE PROJECT SITE

No.[a]	Location	Jurisdiction	Land Use	Size/Use	Distance to Project Site (ft)
2	101, 125, 139, 140, 150 Market Street	Residential	50	DU	950
		Retail	40,000	SF	
5	419 S. Eucalyptus Avenue	Residential	6	DU	550
6	315 W. Queen Street	Residential	21	DU	875

Notes:
a. Related projects list based on information from City of Inglewood.
b. Sf = square feet, DU = dwelling units.
Source: LLG, 2025

The SCAQMD recommends using two methodologies to assess the cumulative impact of air quality emissions: (1) a project's consistency with the current AQMP be used to determine its potential cumulative impacts or (2) that project-specific air quality impacts be used to determine the project's potential cumulative impacts to regional air quality.[74]

[74] SCAQMD, Potential Control Strategies to Address Cumulative Impacts from Air Pollution White Paper, Appendix D, 1993, page D-3 ("As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the Project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.").

Consistency with Air Quality Management Plan

The SCAQMD recommends assessing a project's cumulative impacts based on whether the project is consistent with the current AQMP. CEQA Guidelines Section 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, CEQA Guidelines Section 15064(h)(3) states in part that:

> *"A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. 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…"*

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's cumulative air quality impacts are determined not to be significant based on its consistency with the SCAQMD's adopted 2022 AQMP, as discussed above. As is also discussed above, the Project's increase in population, housing and employment would be consistent with Connect SoCal 2020 growth projections, upon which the 2022 AQMP is based. Related projects would also be required to assess consistency with the 2022 AQMP transportation control strategies, as well as with population, housing, and employment growth projections in Connect SoCal 2020 and provide mitigation measures if significant impacts are identified. As discussed in Threshold AIR-1, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for ozone. Therefore, the Project would be consistent with and would not conflict with or obstruct implementation of the applicable AQMP. Accordingly, Project air quality impacts are not cumulatively considerable and cumulative impacts are less than significant.

Project-Specific Impacts

The SCAQMD CEQA Air Quality Handbook states that the "Handbook is intended to provide local governments, project proponents, and consultants who prepare environmental documents with guidance for analyzing and mitigating air quality impacts of projects."[75] The SCAQMD CEQA Air Quality Handbook also states that "[f]rom an air quality perspective, the impact of a project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air pollution thresholds established by the District."[76] The SCAQMD has provided guidance on addressing the cumulative impacts for air quality. as discussed below:[77]

> *"As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the Project-specific significance thresholds are*

[75] SCAQMD, CEQA Air Quality Handbook, April 1993, page iii.

[76] SCAQMD, CEQA Air Quality Handbook, April 1993, page 6-1.

[77] SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution, 2003, Appendix D.

> *considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

The SCAQMD recommends evaluating cumulative impacts for individual projects based on whether the project exceeds the SCAQMD's recommended daily thresholds for project-specific impacts for those pollutants for which the Air Basin is in non-attainment. Thus, the cumulative analysis of air quality impacts follows SCAQMD's guidance such that construction or operational Project emissions would be considered cumulatively considerable if Project-specific emissions exceed an applicable SCAQMD recommended significance threshold.

The City relies on thresholds established by the SCAQMD (refer to CEQA Guidelines Section 15064.7) to assess the Project's cumulative impacts. Regional emissions from a project have the potential to affect the Air Basin as a whole, and, unlike other environmental issues areas, such as aesthetics or noise, it is not possible to establish a geographical radius from a specific project site where potential cumulative impacts from regional emissions would be limited. Meteorological factors, such as wind, can disperse pollutants, often times tens of miles downwind from a project site. Therefore, consistent with accepted and established SCAQMD cumulative impact evaluation methodologies, the potential for the Project to result in cumulative impacts from regional emissions is assessed based on the SCAQMD thresholds.

For construction, as shown in Table 4.2-4 and 4.2-6, the Project would not result in an exceedance of regional and localized significance thresholds for construction. For construction health risk impacts, as shown in Table 4.2-8, the Project would not result in an exceedance of applicable significance thresholds. Therefore, cumulative impacts related to regional and localized construction emissions would be less than significant.

For operations, as shown in Table 4.2-5 and 4.2-7, the Project would not result in an exceedance of regional or localized significance thresholds. Therefore, cumulative impacts related to regional and localized operational emissions would be less than significant.

Mitigation Measures

Construction

Cumulative impacts regarding localized construction air pollutant emissions were determined to be less than significant. Therefore, no mitigation measures are required.

Refer to Mitigation Measure AQ-1, which would reduce cumulative regional construction air pollutant emissions and health risk impacts during construction. No additional mitigation measures are required.

Operations

Cumulative impacts regarding regional and localized operational air pollutant emissions were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Construction

Implementation of Mitigation Measure AQ-1 would reduce regional construction air pollutant emissions construction health risk impacts to below applicable significance thresholds. Cumulative air quality impacts would be less than significant with mitigation. Therefore, with implementation of Mitigation Measure AQ-1 no additional mitigation measures are required or included, and the impact level would be less than significant with mitigation.

Operations

Cumulative impacts regarding operational air pollutant emissions were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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4.3 Cultural Resources

4.3.1 Introduction

This section provides an assessment of potential impacts to cultural resources, specifically, impacts to archaeological and historical resources, that could result from the implementation of the Project. The analysis in this section is based on the *Inglewood High School Reconstruction Project - Archaeological Resources Assessment Report* (Archeological Resources Report) and the *Inglewood High School Historic Resources Assessment* (Historic Resources Assessment) prepared by ESA, provided in Appendix D1 and D2, respectively, of this Draft EIR.

4.3.2 Environmental Setting

Regulatory Framework

Cultural resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of cultural resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. As described below, the principal state and local laws governing and influencing the preservation of cultural resources of national, State, regional, and local significance include the following:

- The California Environmental Quality Act
- The California Register of Historical Resources
- The California Health and Safety Code
- The California Public Resources Code
- Assembly Bill 52 and Related Public Resources Code Sections

State

California Environmental Quality Act

CEQA is the principal statute governing environmental review of projects occurring in the state. It is codified in Public Resources Code (PRC) Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA Section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

CEQA Guidelines Section 15064.5 recognizes that historical resources include: (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or

cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2, a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place (PRC § 21083.1(a)). If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (15064.5(c)(4)).

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired" 15064.5(b)(1). According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior's Standards (SOI Standards) for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings is considered to have impacts that are less than significant (15064.5(b)(3)).

California Register of Historical Resources

The California Register of Historical Resources (California Register) is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC § 5024.1(a)). The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register of Historic Places (National Register) criteria (PRC § 5024.1(b)). Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, State, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

California Health and Safety Code

California Health and Safety Code Sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable PRC Sections), and the disposition of Native American burials in archaeological sites. These regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

California Public Resources Code (PRC)

California PRC Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the landowner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

Local

County of Los Angeles General Plan

The Conservation and Natural Resources (C/NR) Element of the County's adopted General Plan indicates that "Historic, cultural, and paleontological resources are an important part of Los Angeles County's identity" (Los Angeles County General Plan 2015: 163). The C/NR Element provides the following goal and policies for the treatment of cultural resources:

Goal C/NR 14: Protected historic, cultural, and paleontological resources.

Policy C/NR 14.1: Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.

Policy C/NR 14.2: Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.

Policy C/NR 14.3: Support the preservation and rehabilitation of historic buildings.

Policy C/NR 14.5: Promote public awareness of historic, cultural, and paleontological resources.

Policy C/NR 14.6: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

Existing Conditions

Historical Resources

Historic Setting

City of Inglewood

During the rancho period in Alta California, the area that is now the City of Inglewood was part of the *Rancho Aguaje de la Centinela* and the *Rancho Sausal Redondo* and was under the rule of the Mexican government. A year after Mexico gained independence from Spain and control of California in 1822, Los Angeles resident Antonio Avila received a land grant for *Rancho Sausal Redondo* and grazed cattle there as well. The rancho encompassed the areas that are now the Cities of Redondo Beach, Inglewood, Hawthorne, El Segundo, Lawndale, Manhattan Beach and Hermosa Beach. In 1834 Ygnacio Machado, one of the original leather jacket soldiers that escorted settlers to Los Angeles, built the Centinela Adobe. The Centinela Adobe was in the center of what became a 2,200-acre ranch on a portion of the *Rancho Sausal Redondo*. Machado had moved onto what he claimed was still public land, which was granted to him as the *Rancho Aguaje de la Centinela*.

Soon after, Machado traded the *Rancho Aguaje de la Centinela* for a keg of whiskey and a home in the Pueblo of Los Angeles. The property changed hands multiple times and was eventually acquired by a Scottish nobleman named Robert Burnett, who subsequently added the much larger Rancho Sausal Redondo to his holdings and reunited the ranchos. Burnette eventually returned to Scotland and leased the ranch to a Canadian immigrant who was considered by many to be the founding father of Inglewood: Daniel Freemen. In spite of drought and other hardships, Freeman successfully farmed barley on the ranch and purchased it from Burnette with gold in 1885. Freeman went on to become a major land developer in Inglewood (Kielbasa 1998).

Centinella Springs (California Historical Landmark 363), also known as Aguaje de Centinela, was a highly valued source of spring water for the Rancho Aguaje de la Centinela and was described as having continuously existed since the Pleistocene Era. The site is still located at the corner of Centinela Avenue and Florence Boulevard (OHP 2022). Excursion trains from Los Angeles brought many prospective land buyers to Inglewood, and it grew to 300 residents by 1888. On May 21, 1888, a school opened with 33 students. Around this time, businesses, including Mrs. Belden's Boarding House, two grocery stores, a drug store, a planning mill, a wagon repair shop, a plumbing shop, a livery stable, and five real estate offices, were built on Commercial Street (now La Brea) (Waddingham 1994). With a population of about 1,200, Inglewood was incorporated on February 10, 1908.

On the evening of June 21, 1920, a large earthquake struck Inglewood. Although there was significant damage to buildings, fortunately, there was no loss of life. The next few days saw many tourists coming

to Inglewood to view the damage. The climate impressed the visitors who had previously never been to Inglewood, and many settled there. The population grew to 3,286 in 1920, and in the next two years, the population doubled, making Inglewood the fastest growing city in the nation at that time (Waddingham 1994). The Andrew Bennett Ranch was leased by the City of Los Angeles and converted into Mines Field in 1927, the airport of Los Angeles. National Air Races were held on Mines Field in 1927, and the first commercial passenger flight landed in 1928. In 1929, the Graf Zeppelin (a German hydrogen filed ridged airship) landed on the Mines Field (Waddingham 1994).

The 1932 Olympic Games were held in Los Angeles, and three Inglewood High School alumni won medals. Many buildings in Inglewood were used as training facilities, and the marathon route went through the town. Until World War II, Inglewood had been mainly supported by agricultural industry. The defense industries, in response to WWII, transformed Inglewood into an urban community when industrial activities brought more people to live in the city. In 1946, major airlines moved operations to the Los Angeles International Airport (LAX) and two new hangars needed to be constructed. In 1949, the airport was designated as an intercontinental air terminal by the federal government (Waddingham 1994).

In 1967, The Forum was opened as the home of the Los Angeles Lakers of the National Basketball Association and the Los Angeles Kings of the National Hockey League. It also hosted a number of events such as concerts, rodeos, boxing, the circus, and ice shows (Waddingham 1994). The Forum underwent a rehabilitation, was listed on the National Register and the California Register and reopened in 2014. Additionally, at that time, The Forum underwent an adaptation from an arena primarily designed for sporting events to an arena used mainly for music and entertainment events.

In the 1970s, a new health center and library were built on W. Manchester Boulevard as part of the new City of Inglewood Civic Center, which was dedicated in 1973. The Airport Park View Motel opened between Hollywood Park Race Track and The Forum (Waddingham 1994). Many senior housing developments were also built in Inglewood during the 1970s.

More recent developments include the closure of the Hollywood Park Racetrack, in 2013, and demolition of the track in 2016. A new NFL stadium, the SoFi Stadium, is part of a new mixed-use development in Inglewood that includes commercial office space, retail, a hotel, residential units and outdoor parks was recently constructed and is now in operation (SoFi 2025). The stadium is home to the Los Angeles Chargers and the Los Angeles Rams, and recently hosted Super Bowl LVI and will host the Opening and Closing Ceremonies of the Olympic Games in 2028.

Historic Resources Identified Within the Project Vicinity

SCCIC Records Search

A records search for the Project Site was conducted on January 17, 2025, at the California Historical Resources Information System South Central Coastal Information Center (CHRIS-SCCIC) housed at California State University, Fullerton by Environmental Science Associates (ESA). The records search included a review of all recorded historic architectural resources and previous studies within a 0.25-mile radius of the Project Site.

Previously Recorded Historic Architectural Resources

The records search results indicated that a total of one historic architectural resource is located within 100 feet of the Project Site: P-19-186693, the Lundeberg Works Progress Administration (WPA) Transportation Mural, created in 1939. The resource is a rare remaining example of a petrachrome mosaic WPA mural that conveys the history of Inglewood and the impact of WPA's artistic legacy. This historic architectural resource has a status code of 1CS, as it is listed in the California Register of Cultural Resources, and is included in **Table 1**, below. There were no previously recorded historic resources located within the Project Site.

BERD Records Search

A review of the California Built Environment Resources Directory (BERD) for Los Angeles County indicated twenty-three historic architectural resources located within a 0.25-mile radius of the Project Site. Listed and eligible resources include the Lundeberg WPA Transportation Mural, discussed above; the Inglewood Civic Center, located 0.03-miles north of the Project Site, with a status code of 2S2; and the Fox Theatre which is located 0.20-miles northeast of the Project Site and has a status code of 1S. Of these, the Lundberg WPA Transportation Mural and the Inglewood Civic Center both have direct views of the Project Site.

The remaining twenty historic resources identified in the BERD have status codes of 6Y and were determined to be ineligible for inclusion on the National Register by consensus through the Section 106 process; they have not been evaluated for listing on the California Register.

Potentially Eligible Historic Resources

Four potentially eligible resources were identified as part of a windshield survey of the surrounding area and are located adjacent to the Project Site, offering a view of the campus. The potentially eligible resources have not been previously identified in a historic survey and are not included in the BERD. These include: 102 E. Kelso Street; 200 W. Kelso Street; 130 W. Kelso Street; and 144 W. Kelso Street, and are included in **Table 4.3-1**, below.

Additional Research

Additional site-specific research was conducted on Inglewood High School (IHS) utilizing the following sources: City directories, plans and aerial photographs, historical photographs and articles from *The Los Angeles Times, The Register, and The Daily Breeze* newspapers, the Los Angeles County Assessor website, and other published sources. Research was conducted at the IHS campus library. Historic maps and aerial photographs were examined to provide historical information about IHS and the land uses surrounding the campus. Historic aerial photographs taken in 1928, 1934, 1941, 1956, and 1968, and a 1950 Sanborn fire insurance map were examined. Architectural drawings obtained from the District were essential in preparing the construction history for IHS from 1934 to 1980. The earliest plan on file dated to 1934, was for modifications to Building A as part of the extensive rehabilitation undertaking that followed the 1933 Long Beach Earthquake. Campus master plans were not located.

TABLE 4.3-1
HISTORIC ARCHITECTURAL RESOURCES LOCATED WITHIN A 0.25-MILE RADIUS OF INGLEWOOD HIGH SCHOOL (IHS) WITH VIEWS OF THE CAMPUS

Name	Address	Description	Status Code	Source	Built Date	Distance from Project Site	View of Project Site
Lundeberg WPA Transportation Mural (19-186693)	Grevillea Art Park (Grevillea Ave between Manchester Blvd and Kelso St)	A rare remaining example of a petrachrome mosaic WPA mural that conveys the history of Inglewood and the impact of WPA's artistic legacy.	1CS (Listed in the CA Register)	SCCIC, BERD	1939	0.02 miles east	Direct View
Inglewood Civic Center	101 W. Manchester Blvd	A 29-acre complex with buildings designed by architect Charles Luckman in 1973 and includes City Hall, a library, fire station, police facility, public health complex and parking garage. Landscape design by landscape architect Robert Herrick Carter.	2S2 (Eligible for the National Register)	BERD	1972-1973	0.03 miles north	Direct View
Blood of Jesus Prayer & Deliverance Ministries	102 E. Kelso Street	Altered Period Revival style church building	N/A	See Appendix D1	1922	.02-miles southeast	Direct View
200 W. Kelso Street	200 W. Kelso Street	Altered two-story American Foursquare style single-family home	N/A	See Appendix D1	1908	.07-miles southwest	Direct View
130 W. Kelso Street	130 W. Kelso Street	Altered one-story bungalow-style home	N/A	See Appendix D1	1911	.03-miles south	Indirect View
144 W. Kelso Street	144 W. Kelso Street	Altered one-story bungalow-style home	N/A	See Appendix D1	1913	.05-miles southwest	Indirect View

Identification of Historic Architectural Resources

The analysis of historical resources in this section of the Draft EIR is based on the evaluation of historical resources presented in the Historic Resources Assessment, provided in Appendix D2 of this Draft EIR. The analysis in Appendix D2 was prepared by qualified personnel who meet and exceed the Secretary of the Interior's Professional Qualification Standards in history and architectural history. As described within the Historic Resources Assessment, the key steps taken in completing the analysis included research of the Project Site's development including a review of historic plans for improvements to the Project Site, Sanborn Fire Insurance maps, historic photographs, aerial photographs, select IHS yearbooks, local newspapers, the Collection of Inglewood Local History Photographs, and the Los Angeles Public Library Photo Collection. The results of the CHRIS-SCCIC and the BERD records search were consulted to identify any previous evaluations of Project Site and potential historic resources within a 0.25-mile radius of the Project Site. A 0.25-mile radius is the typical study area for a dense, urban environment, as it allows for an analysis of potential visual impacts that could occur in such a built-up area. ESA architectural historians conducted a historic architectural resources survey of the IHS on January 25, 2025. Detailed notes and digital photographs were taken, and the survey work utilized the

survey methodology of the State Office of Historic Preservation (OHP). ESA evaluated the IHS campus, three buildings that rose to an individual level of discrete significance, and two buildings as contributing resources to a historic district for historic associations with design. The results of the research, survey, and findings are presented below.

Historical Background

Inglewood High School Campus

The IHS campus was developed over the course of nearly nine decades, with currently extant buildings constructed between 1925 and 1991 (GGA 2024). At the turn of the 20th century, the land that surrounded what would become the IHS campus was largely dedicated to agricultural development, a pattern that would continue through the next few decades before the rise of defense and aerospace industries. These local industry shifts were reflected in changes to the IHS campus and its curriculum, which offered relevant training opportunities for students entering the workforce before, during, and shortly after World War II. A substantial, yet discontiguous, postwar construction campaign to accommodate more students expanded the campus to its present configuration as it largely exists today.

The original main two-story school building with basement was designed in the Classical Revival style and constructed in 1909 (Reflux 2012). The multi-functional structure was used as a study hall, assembly space, offices, teachers' restrooms, and classrooms. Shortly after the construction of this first campus building, the City of Inglewood was formally incorporated in 1908.

In 1914, five new Classical Revival-style brick buildings were constructed. Architect Norman F. Marsh designed them to complement the original 1907 building, establishing a unified campus, forming a quadrangle with the original 1907 building (LATimes 1914) (Reflux 1915) (Evening Vanguard 1914). An arcade, or covered walkway, was constructed to connect the original 1907 building to a new household building to the north and a new science building to the south. A manual arts building, gymnasium, and small boiler room were constructed on the west portion of the campus. During this period, a steam plant sat towards the center of the campus, which served as a generator providing heat, power, and light to IHS. It is no longer extant.

In the early decades of the 20th century, IHS operated a demonstration farm, known as the Inglewood High School Farm, as part of its agricultural department curriculum. The ten-acre farm was located approximately 0.50-miles to the southwest of campus at Kelso Street and Inglewood Avenue (Inglewood 2025). Considered an important part of the school's programming for male students, practical farming coursework reflected the local economy, preparing them for life after graduation as farmers or stockmen. The IHS farm had barns, corrals, hog houses, tractors, horses, and herds of both hogs and cattle, with a residence for the farm supervisor. According to a 1921 newspaper article, the "program included plant growth and field work, animal husbandry and dairying, soils, horticulture and fertilizer, farm surveying, irrigation practice and farm management" (Lyans 1921).

In 1924, plans for new buildings were created by Los Angeles architect George A. Howard Jr., and were designed to match the early Classical Revival-style design of the campus. Buildings constructed at this time included a boys' gymnasium with a swimming pool to be built to the northwest of the early administration building with additional classrooms added at the administration building (Daily 1924) (Press 1924) (LA Times 1924). A new two-story Classical Revival style Fine Arts Building, known today

as Building A, was constructed in 1925. Building A underwent an extensive retrofit following the 1933 Long Beach Earthquake, during which time the building was seismically strengthened and reenvisioned in the fashionable PWA Moderne style (LA Times 1925).

In 1933, the Inglewood High School Farm's agricultural grounds were proposed to be converted into an athletic field which would allow students greater opportunity for outdoor activities that were not possible on the main campus' then-current athletic grounds (LA Times 1933). The land would become Sentinel Field and later Caroline Coleman Stadium. The closure of the school farm allowed for a significant change in the school's vocational curriculum, which for decades had strongly reflected its surrounding agricultural industry. The Inglewood area's shift from agriculture to the aerospace and defense industry was fueled by the development of the nearby Mines Field which would later become the Los Angeles International Airport (LAX), and the development of the U. S. Air Force's Space and Missile Program in Inglewood. This rapid change was reflected in IHS' campus development and academic offerings throughout the 1940s and into the post-World War II development boom.

In the fall of 1940, the "Inglewood adult education center and evening high school" opened for adult night school courses at the IHS campus (Breeze 1940). In addition to science and arts courses, a substantial portion of the adult education center's offerings included courses in cooperation with the state and national defense program, including pre-employment courses, wood pattern making, plaster pattern making, and machine shop courses. Additional supplementary trade courses included elementary template layout and lofting, advanced aircraft lofting, aircraft sheet metal layout, and aircraft welding (Breeze 1946). Two buildings, Building K, Shop and Building J, Classroom were constructed in 1941 to designs by architect John C. Austin. The modest building designs reflect the Industrial Utilitarian style.

After the United States entered into World War II in December 1941, industry in Inglewood was markedly dominated by production plants, aerospace manufacturing, and associated support activities. On the home front, IHS offered opportunities for adult education training including vocational courses such as architectural, aeronautical and mechanical drafting, blueprint reading, carpentry, machine shop, and welding (Breeze 1946). A canning center was established on the campus in 1945, which operated on a 12-hour schedule in which more than 1,000 women attended instructional sessions in order to use the campus' canning facilities (LA Times 1945b).

The war ended in September of 1945 and with it, Inglewood was fueled by postwar prosperity and experienced rapid suburban growth, marked by commercial, civic, and residential development. Postwar IHS campus development included significant expansion efforts requiring the demolition of the remaining original 1907-1925 Classical Revival-style buildings (except for Building A), to make space for the construction of modern educational buildings (LA Times 1945a) (Inglewood 1941). As portions of original early 20th century IHS campus were demolished in a piecemeal fashion following the 1933 Long Beach earthquake, the campus was subsequently slowly redeveloped over time with limited efforts in the 1930s and 40s, followed by more rapid infill redevelopment resuming after the war. In 1948, the construction of a two-story shop classroom building, Building M, included drawing and drafting instructional rooms, woodworking shop spaces, assembly areas, lumber/tool rooms, and a finishing room (LA Times 1946). A new automobile shop building was constructed in 1949 (Building L, Shop). Campus upgrades to bring modern cohesion to the school during this period included new flagpoles, an arcade entrance with signage along S. Grevillea Avenue, planters, landscaping, and covered walkways. New postwar development between the late 1940s through the 1950s included: Building C, Classroom (1948);

Building R, Auditorium (1949); Building O, Locker Building (1949); Building B, Classroom (1950); Building D, Classroom (1955); Building E, Classroom (1955); Building G1, Classroom (1955); Building Q, Library (1955); and Building P, Gymnasium (1956). The new auditorium building, Building R, was constructed in 1965.

A food service building (Building FS) was added to the far northwest portion of the campus in 1987. Between 1991 and 1995, Buildings F2, H4, H5, and N were constructed, which occurred in conjunction with campus-wide renovations of existing buildings.

Building A

As part of a large construction campaign at the school, a new two-story Fine Arts Building with a basement was constructed at the northeast corner of campus in 1925. Today, the Fine Arts Building, known as Building A, remains the oldest extant building on campus. It was later modified from a Classical Revival style building to a PWA Moderne-style in the 1930s, as discussed below (LA Times 1925).

In March of 1933, the Long Beach earthquake caused substantial damage to the Classical Revival-style IHS campus (LA Times 1933b). Architect T.C. Kistner had been engaged to fireproof the fine arts building (Building A) just prior to the earthquake, and his involvement continued after the event to address campus-wide building reconstruction and structural strengthening efforts (LA Times 1934, 1935). As a result of Kistner's engagement after the earthquake, the renovation and retrofit of Building A was featured in a *The Architect and Engineer* magazine article written by the project's structural engineer William T. Wright. Building A was described as a national example of how an existing building was "successfully treated" after an earthquake in order to strengthen and reinforce it for future use. Building A was further noted for its dramatic stylistic transformation from the Classical Revival style to the PWA Moderne style, which the article referred to as a "facelifting" effort (Wright 1936). As part of this process, four inches of brickwork were removed and replaced with gunite, a material consisting of cement, sand and water, sprayed onto the exterior. New columns and beams were installed for reinforcement, fireproof stairways were introduced, roof trusses were reinforced, and new windows were installed for improved lighting. These facelifting efforts were cost effective and allowed for federal Great Depression-era relief labor by the Civilian Works Administration (CWA) and State Emergency Recovery Agency (SERA), while effectively reenvisioning the building into a contemporary adaptation of Classical Revival architecture.

Today, Building A largely reflects the post-1933 modernization efforts in Long Beach following the earthquake. As applicable to Building A, the *LAUSD Context Statement* notes that "it is common to find 1920s-era schools that were remodeled following the earthquake; such schools might exhibit the building plans and configurations typical of the 1920s but with 1930s PWA Moderne and Streamline Moderne detailing" (Sapphos 2014).

Noted exterior alterations following the 1930s retrofit include the replacement of doors and glazing in the original window openings. These minor alterations occurred as part of a renovation by master architect H.L. Gogerty, who designed most of the other buildings on the IHS campus. Correspondence regarding the upgrades for Building A began in 1953; however, it is unclear if changes were implemented in the 1950s or if work commenced in 1960, the date of the plans on file with the district. In the 1960s, a new

door opening was added on the north elevation, along with a set of non-original concrete stairs that were to serve as a loading area (District 1953). Wire glass skylights were also altered during the renovations by Gogerty's firm, and aerial photographs show that most of the original skylights have been covered or removed. Visual inspection yielded that the original incised lettering over the north entrance, "Truth is Beauty," was replaced at an unknown date with the contemporary lettering: "Inglewood High School Bldg A Administrative Offices." A ramp was added to the southwest corner of the south elevation to meet ADA and egress requirements at an unknown date. Few alterations have occurred to the exterior, and most, if not all, appear to be generally compatible with the 1930s design and have been articulated sensitively by master architect Gogerty. Internally, the stage area in the cafeteria, featuring pilasters and elaborate wood door surrounds and transoms, is an original feature of the 1925 design. The first floor's double-loaded corridor was reconfigured in 1960 to include the current wood paneling and display cases, and the staircase handrails were also added at this time.

Building I

In October of 1935, the school district passed a bond issue vote for $300,000 for the continued rehabilitation of the earthquake-damaged campus which was aided by PWA grants (Monrovia 1935). In 1936, Building I, Classroom was constructed to PWA Moderne style designs by architect T.C. Kistner, located southeast of Building A. The following alterations have occurred to the exterior: original doors and transoms have been replaced, and windows and transoms have been covered or painted over.

Building M

Campus development in the late 1940s included the construction of the two-story 24,000-square-foot shop Building M. In August of 1945, Building M was approved for construction by the Civilian Production Administration (CPA). The CPA absorbed the functions of the War Production Board (WPB), which was a federal wartime government agency established to oversee and coordinate American industry to wartime production during World War II (Purcell 2025). The WPB monitored the construction of factories that produced essential war materials, ultimately contributing to the efficiency of postwar economic reconversion. The war ended in September of 1945. Building M was constructed in 1949 for a cost of $240,000. As originally designed by master architect Henry L. Gogerty, the building included drawing and drafting instructional rooms, woodworking spaces, assembly areas, lumber/tool rooms, and a finishing room (LA Times 1946).

The following are undocumented exterior alterations to Building M: select windows panes have been painted over, original wire glass shop display windows on the first floor have been removed or covered, a few windows next to entrances on the second floor have been removed or covered, and two roll-up garage doors have replaced original metal doors on the first floor. The interior has been renovated, likely in 1995.

Building L

Campus development in the late 1940s included the construction of the one-story roughly 3,360-square-foot automobile shop Building L. Initially referred to as "Auto Shop 'Unit Q'," 1948 plans for Building L indicate that its entrance and orientation were designed to line up with those of existing Building M, next door. As originally designed by master architect Henry L. Gogerty, Building L included a tool room and office within the smaller 1-story room, a cast stone wash sink, two roll up garage doors, and an open space dedicated to the following: work area, engine area, machine area, and instruction area. A smaller room located adjacent to the arcade was to be used for athletic equipment. The 1948 plan notes suggest

that a covered open-air arcade was planned to connect Buildings L and M to one another, while other plans indicate that a further arcade extension *beyond* Building L was considered for a later date. The building's 1949 plumbing plans included three additional "future shops," similarly rectangular in footprint, were to be attached to the west of Building L, yet these were never constructed. Aerial photographs show that the formerly undeveloped area to the west of Building L was commonly used for parking adjacent to the building making for easy street access along Manchester Avenue, to which the auto shop's garage doors were oriented. The following alterations have occurred to the exterior: an original multi-lite garage door has been replaced with a metal roll up garage door, select steel sash windows have been removed, painted, or altered, and an entrance in the southwest corner has been enclosed.

Historic Architectural Survey Results

Inglewood High School Campus

The campus is bounded by W. Manchester Boulevard to the north, S. Grevillea Avenue to the east, Kelso Street to the south, and commercial and residential development to the west. The surrounding neighborhood includes the 1970s Inglewood Civic Center to the north; Grevillea Art Park, multi-family housing, a commercial building and a church to the east; multi-family housing and single-family residences which were constructed between the 1920s and the 1960s to the south; and a combination of 1920s and 1930s single-family homes, and mid-century period multi-family housing to the west. The Subject Property houses Inglewood High School, Inglewood Continuation High School, and a District food services building.

The campus includes tennis courts and six basketball courts, located near the center of the property, with a large playing field situated along the western boundary, which includes two baseball diamonds. Picnic tables and umbrellas are located in the northeastern part of the campus, with another outdoor seating area located south of this, further east. A gated parking area sits along W. Kelso Street. The campus is enclosed by a continuous, non-original chain-link fence, with metal access gates located along W. Manchester Boulevard and S. Grevillea Avenue. The primary pedestrian entrance onto campus is along S. Grevillea Avenue and includes a mid-century arcade with Inglewood High School signage, a flagpole, and brick planters. The Inglewood Continuation High School, which will not be evaluated as part of this study due to age, includes paved recreational play areas. The campus features concrete and asphalt-paved areas that serve as walkways, courtyard spaces, and play areas, with some buildings equipped with expansive overhangs that cover paved pathways. The primary landscaped areas include swaths of grass along S. Grevillea Avenue at the eastern edge of campus. There are a few trees and shrubbery located within the campus.

Twenty-four buildings comprise the IHS campus. The earliest building on campus dates to 1925 (Building A), with one building constructed in the 1930s (Building I), seven buildings constructed in the 1940s (Buildings C, J, K, L, M, O, and R), eight buildings constructed in the 1950s (Buildings B, D, E, F1, G1, H1-H3, Q and P), and three buildings built in the 1960s (Buildings G2, S, and X). Collectively, these 20 buildings reflect the historic period for the property. Due to the incongruous nature of campus historic period development from the 1920s through the 1960s, the campus does not reflect an established master-plan campus type, as would have been expected of a high school campus designed during a single time period.

As Inglewood became increasingly industrialized in the mid-20th century, IHS responded to the emerging aerospace and aviation industries, as well as related defense industries, by offering relevant training programs and coursework on campus, which was open to both IHS students and community members. Two shop buildings (Buildings L and M) were constructed to accommodate these larger industrial changes, however Buildings L and M do not collectively form a historic district reflective of the wartime and postwar shift in curriculum programming, but instead, form a historic district due to their shared architectural style, architectural designer, and building typology as examples of daylight factories on a public-school campus, as explained in detail below. The campus as a whole does not have historic associations with the Post 1933 Long Beach patterns of development, as only one remaining building was retrofitted during this period (Building A), and one new building (Building I) was constructed as part of wider-reaching federally funded Great Depression era programming. The formation of the Inglewood Unified School District (IUSD) may have been a response to the city's population boom, a pattern that similarly occurred in the City of Los Angeles and across the country following the war. Inglewood itself underwent a significant transformation during this period, from a largely agricultural-based economy to one heavily supported by industrial activities. This shift brought more workers and their families into Inglewood in the mid-century. Yet despite these vast changes in Inglewood, the IHS campus was not developed as a cohesive ensemble of buildings with a shared goal over time, but rather a more disjointed effort. Research did not indicate that the buildings that comprise the IHS campus collectively demonstrate the history of the IUSD or of the City of Inglewood due to numerous demolition and infill campaigns over time. As such, the campus does not rise to a necessary level of significance as a collection of 20th-century-era school buildings in Inglewood worthy of consideration as a historic district. Additionally, research did not indicate that this campus was the site of a significant event. The campus reflects various periods of development and stylistic contributions as devised by three master architects. The extant buildings and site features represent a collection of piecemeal architecture without a unified layout, cohesive aesthetic, or consistently designed features across the campus. This eclectic character, demonstrated by various periods of construction and architectural styles, has rendered a non-cohesive campus that does not express the principles or values associated with an early or a mid-century school plant.

As such, the IHS campus does not qualify as a historic district under Criterion A/1-D/4.

Building A, Administration,1925; renovation, 1936

Building A is a one and two-story building over a raised basement constructed in 1925. It contains a two-story H-shaped main portion, and a one-story rectangular wing that extends from the west elevation. The massing is formal and generally symmetrical, with rectangular and curved volumes that project slightly from the corners of the building. The building is brick masonry construction that was reinforced with a steel continuous truss system, beams, and columns, and is sheathed in Gunite. These updates occurred between 1934 and 1936 as part of a retrofit after the 1933 Long Beach earthquake. It was at this time it was renovated and modernized from its original Classical Revival design to the 1930s fashionable PWA Moderne style present on the exterior today. It features a flat roof with a raised parapet, and the building is divided vertically by plaster reeded pilasters that rise from wide concrete piers at the foundation level. Awning and fixed windows are situated between the pilasters in recessed channels. Horizontal accent moldings form the spandrels above the fenestration. The exterior is enlivened with cast concrete and plaster zigzag and diamond motifs, tiered vertical line designs, dentil moldings, and a geometric block cornice. A clock in a square frame is at the roofline in the southwest corner. Shallow tiered vertical

pilasters with incised vertical lines form the entrance surround on the east elevation which contains a double-leaf metal door surmounted by a transom of eight vertical strip windows. The incised lettering above the transom, which has been painted over, is still visible and reads “Fine Arts Building.” Secondary entrances include double-leaf and single-leaf metal doors on the north, west, and south elevations.

Building A is recommended eligible as an individual resource under National Register Criteria A at the local level and California Register Criteria 1 as a good example of retrofitted institutional architecture in Inglewood, which resulted from Federal relief effort programs following the 1933 Long Beach Earthquake. Building A is also recommended eligible under National Register Criteria C at the local level and California Register Criteria 3 as it embodies the distinctive characteristics of a type, period, and construction method as an excellent example of a PWA Moderne-style institution in Inglewood, and as a good representative example of master architect T. C. Kistner’s body of work. Building A retains historic integrity and has a period of significance of 1936, which reflects the completion date of the retrofit construction.

Building I, Classroom, 1936

Designed in a PWA Moderne style, Building I is a one-story structure with a rectangular plan, characterized by formal symmetry and massing. The building is reinforced board-formed concrete sheathed with stucco and has a flat roof with a low parapet. A metal coping border at the roofline surmounts shallow square relief patterns at the entablature. Building I is divided into four bays by fluted pilasters, with groupings of five fixed aluminum window assemblies that sit below horizontal speedline banding. Each bay includes a curved cast-concrete window planter with geometric brackets and circular medallion designs below the windows. The entrances on the west and east contain replacement metal doors that sit recessed under a wood and metal canopy flanked by curved concrete walls, with a curved entrance porch and curved pony wall.

Building I is recommended eligible as an individual resource under National Register Criteria A at the local level and California Register Criteria 1 for its association with educational development in Inglewood during the Great Depression, and as a product of the Field Act following the 1933 Long Beach Earthquake in Southern California. Building I is also recommended eligible under National Register Criteria C at the local level and California Register Criteria 3 as a rare example of the PWA Moderne style as applied to a school building in Inglewood. Further, the building is important as a unique small scale example of master architect T. C. Kistner’s work. Building I retains historic integrity and has a period of significance of 1936, which reflects its date of construction.

Building M, Shop, 1948

Designed in an industrial, utilitarian style with elements of a daylight factory typology, Building M is a one- and two-story building that is generally rectangular in plan. The building was designed by H.L. Gogerty with Julian T. Stafford as the structural engineer. The one-story portion to the north, fronting Manchester Boulevard, is capped with a flat and sawtooth roof with steel and wire glass continuous skylights. The two-story portion on the south end of the building contains a flat composition roof. The building is constructed with a steel frame and reinforced concrete. Concrete stairways with pipe metal railings on the southwest and southeast corners lead to a covered walkway. The entrance doors on both floors are double and single-leaf metal doors and are possibly replacements to the original kalamein doors. Fenestration includes the previously mentioned continuous skylights in the sawtooth roof,

continuous horizontal bands of steel sash clerestory windows with projecting frames across the second story, and continuous horizontal bands of steel sash windows with projecting frames that punctuate the elevations of the first story. Metal cyclones for filtering sawdust particles are situated on the western elevation, a remnant of the original use of the building as a woodworking shop.

Building M is recommended eligible as an individual resource under National Register Criteria A at the local level and California Register Criteria 1 due to its role in the area's postwar reconversion as an educational facility that responded to the rapidly evolving aerospace and defense industry. Building M is also recommended eligible under National Register Criteria C at the local level and California Register Criteria 3 as a rare example of an industrial utilitarian shop property type as applied to a public-school campus, both locally and regionally. Further, the building appears to be significant within master architect H. L. Gogerty's extensive body of work as a remaining example of a small, multi-use shop institutional building. Building M retains historic integrity and has a period of significance of 1948, which reflects its date of construction.

Additionally, Building M was determined to be eligible as a contributing resource, along with Building L, to a small historic district, which is discussed below.

Inglewood High School Daylighting Factory Type Shop Building Historic District (IHS Industrial Historic District)

Building L, Shop, 1949

Designed in an industrial, utilitarian style with elements of a daylight factory typology, Building L is a one-story building that is generally rectangular in plan, featuring a square volume that projects from the southwest portion. This volume includes a canopy supported by metal pipes. It is capped with a flat and sawtooth roof and is supported by a steel truss. The building is constructed of wood and reinforced concrete and sheathed in stucco. The entrance doors are single-leaf metal doors. Fenestration includes the previously mentioned continuous skylights in the sawtooth roof, as well as continuous horizontal bands of steel sash windows (awning and fixed) with projecting frames. There are two garage doors on the north elevation: an original one with windows in the top portion and wood panels in the bottom, and a replacement roll-up metal garage door. Building L included a tool room and office within the smaller one-story room (overall volume extant), a cast stone wash sink (extant), two roll-up garage doors (one extant), and an open space dedicated to the following: work area, engine area, machine area, and instruction area. Building L retains historic integrity and has a period of significance of 1949, which reflects its date of construction. Due to its unique architectural style and shared character-defining features of an industrial daylighting factory property type as expressed on a public-school campus, Building L was determined to be eligible as a contributing resource, along with Building M, to a small two-building historic district, discussed below.

IHS Industrial Historic District

Two buildings in the northwestern corner of the IHS campus share a unique building typology as examples of mid-20th century industrial utilitarian shops as applied to a public-school campus. Buildings M and L were constructed within a year of one another, between 1948 and 1949, and both were designed by master architect H. L. Gogerty. As described above, Gogerty's extensive body of work included hundreds of Southern California school buildings, in addition to airplane-focused facilities. With the rise of the City of Inglewood's prominence as the center of the nation's aircraft industry by 1941, the high

school similarly adapted its curriculum and community offerings to include extensive vocational training through two prominent programs that continued in some capacity after World War II - the Adult Education Program and the defense training curriculum. Notably, new campus buildings were needed to accommodate these programs, which served adults in the area and high school students alike. As designed by notable architect Gogerty with stylistic features reflective of those present at his recently constructed Hughes Aircraft Company complex, the two industrial utilitarian buildings oriented adjacent to one another along W. Manchester Boulevard, share several of the same character-defining features of a daylight factory and appear to be unique to a public-school campus both locally and regionally. Further, as designed, the buildings' entrance overhangs and shared walkway align with one another, suggesting a planned collective relationship between the two structures in this portion of campus.

Taken together, contributing shop Buildings M and L reflect a small, intact historic district on the IHS campus, the IHS Industrial Historic District, and are recommended eligible under National Register Criteria C at the local level and California Register Criteria 3. The IHS Industrial Historic District retains historic integrity and has a period of significance of 1948-1949, which reflects its dates of construction.

Archaeological Resources

Prehistoric Setting

Based on recent research in the Southern California region (Douglass et al. 2016), the following prehistoric chronology has been divided into four general time periods: the Paleocoastal Period (12,000 to 8,500 Before Present [B.P.]), the Millingstone Period (8,500 to 3,000 B.P.), the Intermediate Period (3,000 to 1,000 B.P.), and the Late Period (1,000 B.P. to Anno Domini [A.D.] 1542). This chronology is manifested in the archaeological record by particular artifacts and burial practices that indicate specific technologies, economic systems, trade networks, and other aspects of culture.

Paleocoastal Period (12,000–8,500 B.P.)

While it is not certain when humans first came to California, their presence in Southern California by about 9,600 cal B.C. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 11,100 and 10,950 B.P. (Byrd and Raab 2007). During this time period, the climate of Southern California became warmer and more arid and the human population, residing mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources (Byrd and Raab 2007). In the Project vicinity, evidence of Paleocoastal occupation is sparse, and none has been confirmed by scientific dating methods (such as radiocarbon dating) (Douglass et al. 2016).

Millingstone Period (8,500–3,000 B.P.)

During this time period, there is evidence for the processing of acorns for food and a shift toward a more generalized economy. The first evidence of human occupation in the Los Angeles area dates to at least 9,000 years B.P. and is associated with the Millingstone cultures (Wallace 1955; Warren 1968). Millingstone cultures were characterized by the collection and processing of plant foods, particularly acorns, and the hunting of a wider variety of game animals (Byrd and Raab 2007; Wallace 1955). Millingstone cultures also established more permanent settlements that were located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of resources, including seeds, fish, shellfish, small mammals, and birds, were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates),

while those Millingstone occupations dating later than 5,000 B.P. contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region. Cogged stones (cog-shaped stones) and discoidal (stone discs) are also indicative of the Millingstone Period.

In the vicinity of the Project Site, sites that date to this time period appear to have been small settlements or campsites reflecting resource gathering groups exploiting nearby lagoon or marshland (inland swamp) resources and specialized resource processing (such as shellfish). There is a gap in the archaeological record between 6,000 and 5,000 B.P., which suggests that the Project Site vicinity was sparsely occupied or abandoned during this time frame (Douglass et al. 2016).

Intermediate Period (3,000–1,000 B.P.)

During this time period, many aspects of Millingstone culture persisted, but a number of socioeconomic changes occurred (Erlandson 1994; Wallace 1955; Warren 1968). The native populations of Southern California were becoming less mobile and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources (Erlandson 1994). Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants (Byrd and Raab 2007). This period is characterized by increased labor specialization, expanded trading networks for both utilitarian and non-utilitarian materials, and extensive travel routes. Trade increased dramatically during this period, with asphaltum (tar), seashells, and steatite being traded from Southern California to the Great Basin. Use of the bow and arrow spread to the coast around 1,500 B.P, largely replacing the dart and atlatl (Homburg et al. 2014). Increasing population densities, with ensuing territoriality and resource intensification, may have given rise to increased disease and violence between 3,300 and 1,650 B.P. (Raab et al. 1995).

The Intermediate Period is characterized by a lack of manos, metates, and core tools, an increase in the use of mortars and pestles, and the introduction of stone-lined earthen ovens. There is a wider variety and increased numbers of projectile points, and flexed burials are common (Douglass et al. 2016).

In the Project Site vicinity, the population density increased, possibly as a result of the migration of eastern desert Takic peoples into the Los Angeles Basin, which is postulated to have begun by the end of the late Millingstone period and to have continued into the late Intermediate period. The Takic incursion resulted in the introduction of new material culture and mortuary practices, and an increase in genetic variation, population, number of sites, and focus on terrestrial resources. Changes in climate may also have contributed to the increased occupation of the area, as a wetter environment led to increased biological diversity. During this time, the Ballona wetlands (located approximately 5.75 miles northwest of the Project Site) shifted from an open embayment to a more closed, brackish environment. Lowland sites were likely occupied on a seasonal or semi-permanent basis as resource processing camps, with semi-permanent settlements on the bluff tops. Other important local developments during this time period include organized site structure with designated areas for different types of activities, and the rise of the mourning ceremony with the ritual destruction and burial of ground stone and the deceased’s personal possessions. Local settlement patterns reflect functional rather than social differentiation (Douglass et al. 2016).

Late Period (1,000 B.P.–A.D. 1542)

The Late Period is associated with the florescence of the Gabrielino, who are estimated to have had a population numbering around 5,000 in the pre-contact period. The Gabrielino occupied what is presently Los Angeles County and northern Orange County, along with the southern Channel Islands, including Santa Catalina, San Nicholas, and San Clemente (Kroeber 1925). This period saw the development of elaborate trade networks and use of shell-bead currency. Fishing became an increasingly significant part of subsistence strategies at this time, and investment in fishing technologies, including the plank canoe, are reflected in the archaeological record (Erlandson 1994; Raab et al. 1995). At this time, settlement is believed to have consisted of dispersed family groups that revolved around a relatively limited number of permanent village settlements that were located centrally with respect to a variety of resources (Koerper et al. 2002).

In contrast to other parts of Southern California, occupation of sites in the Project Site vicinity appears to decrease during the early Late period, probably due to changing climate that resulted in an overall decline in precipitation, and episodic drought and flooding (the onset of the Late Period coincided with the medieval climatic anomaly [or MCA], a period of extended drought that occurred between A.D. 800 and 1350) (Douglass et al. 2016).

Ethnographic Setting

The Project Site is situated within land traditionally occupied by the Gabrielino (including the Tongva and Kizh). The following summary is not intended to provide a comprehensive account of this group but is instead a brief historical overview based on available information from resources cited below.

Gabrielino (or Tongva and Kizh)

The term “Gabrielino” is a general term that refers to those Native Americans who were sent by the Spanish to the Mission San Gabriel Arcángel. (Bean and Smith 1978). Two indigenous terms are commonly used by tribal groups to refer to themselves and are preferred by descendant groups: Tongva and Kizh (Heizer 1968). Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina (Bean and Smith 1978). Their neighbors included the Chumash and Tataviam to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino are reported to have been second only to the Chumash in terms of population size and regional influence (Bean and Smith 1978). The Gabrielino language was part of the Takic branch of the Uto-Aztecan language family.

The Gabrielino Indians were hunter-gatherers and lived in permanent communities located near the presence of a stable food supply. Subsistence consisted of hunting, fishing, and gathering. Small terrestrial games were hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows (Bean and Smith 1978). Community populations generally ranged from 50 to 100 inhabitants, although larger settlements may have existed. The Gabrielino are estimated to have had a population numbering around 5,000 in the pre-contact period (Kroeber 1925). The Late Prehistoric period, spanning from approximately 1,500 years B.P. to the mission era, is the period associated with the florescence of the Gabrielino (Wallace 1955). Coming ashore near Malibu Lagoon or Mugu Lagoon in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino Indians. Maps produced by early explorers indicate that at

least 26 Gabrielino villages were within proximity to known Los Angeles River courses, while an additional 18 villages were reasonably close to the river (Gumprecht 2001).

Review of a map titled *Kirkman-Harriman Pictorial and Historical Map of Los Angeles County* (Kirkman 1938) shows that an unnamed settlement/village is located southeast and at the foot of Baldwin Hills and north of Aguaje de la Centinela. The Kirkman (1938) map also depicts an "Old Salt Road" used by Native Americans in the vicinity of the Project Site. This salt road appears to be connected with the Old Salt Lake used by Native Americans.

The closest named settlements to the Project Site are *Saa'anga* and *Waachnga*. Review of a map titled *Gabrielino Communities Located on the Los Angeles-Santa Ana Plain* by William McCawley (1996) indicates that the settlement of *Saa'anga* was located approximately 2.5 miles away from the Project Site, while the settlement of *Waachnga* was situated approximately 2 miles away. Both of these settlements are depicted as located close to Ballona Creek.

Identification of Archaeological Resources Identified Within the Project Vicinity

SCCIC Records Search

A records search for the Project Site was conducted on January 17, 2025, at the CHRIS-SCCIC housed at California State University, Fullerton by ESA. The records search included a review of all recorded archaeological) and previous studies within the Project Site and a 0.50-mile radius. A previous records search for another project conducted by ESA and located in the vicinity of the Project Site was also reviewed for previously recorded archaeological resources (ESA, 2023).

Previous Cultural Resources Investigations

The records search results indicate that 15 cultural resources studies have been conducted within a 0.50-mile radius of the Project Site. Approximately five percent of the 0.50-mile records search radius has been included in previous cultural resources assessments involving pedestrian surveys. Of the 15 previous assessments, one study (LA-02904) covered the Project Site; however, this study only consisted of a literature review and did not include a pedestrian survey of the Project Site.

Previously Recorded Archaeological Resources

No archaeological resources (historic or prehistoric) have been previously recorded within the Project Site or 0.50-mile radius. However, review of a previous records search for another project located in the vicinity of the Project Site indicates that a total of five prehistoric archaeological resources (CA-LAN-59, -60, -213, -216, -2768) have been recorded in the general vicinity of the Project Site. More specifically, these prehistoric archaeological resources were recorded in the vicinity of Centinela Creek and approximately 1.8-2.8 miles away from the Project Site. The current Project Site is also located in the immediate vicinity of Centinela Creek.

Additional Research

Additional archaeological resources (the report for which have not yet been archived at the CHRIS-SCCIC as it is still in progress) were identified approximately 4.5 miles away from the Project Site during ground disturbing activities in connection with a development project in Downtown Culver City (ESA 2022). These include two isolated prehistoric metates that were recovered in the upper six feet of

disturbed fill sediments in an area of the property that had been previously developed with a large warehouse building.

Sacred Lands File Search

The NAHC maintains a confidential Sacred Lands File (SLF) which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on December 20, 2024, to request a search of the SLF. The NAHC responded to the request in a letter, dated January 9, 2025, indicating that the results were negative.

Geologic Map Review

Review of the surficial geologic map of the Long Beach 30' X 60' Quadrangle indicates that the Project Site is underlain by old alluvial valley deposits (mapped as Qoa) consisting of "slightly to moderately consolidated, moderately dissected clay, silt and sand, and gravel along stream valleys and alluvial flats of larger rivers" (Bedrossian et al., 2012). These deposits date to the Late to Middle Pleistocene.

Geotechnical Report Review

ESA reviewed the geotechnical report prepared for the Project prepared by Geolabs-Westlake Village (2024). The geotechnical report indicates that a total of nine 8-inch diameter hollow-stem auger borings (B1, B2, PT1-PT7) were excavated across the Project Site ranging in depth from 5 to 50 feet in depth. The geotechnical analysis indicates that concrete, sidewalk, lawn, or asphalt was found at the surface down to approximately 1-1.5 feet bgs, followed by undocumented artificial fill up to a maximum thickness of 3 feet. However, there is also a narrow strip of land along the northeastern-most boundary of the campus where the maximum fill depth is 8 feet. Older alluvium, herein referred to as the Lakewood Formation (Qlw), composed of clays, silts, and silty-to-gravelly sands were found beneath the fill materials extending to 10 feet bgs. (Geolabs-Westlake Village 2024).

Pedestrian Survey

An archaeological survey of the Project Site was conducted on February 3, 2025, by ESA staff. The survey was aimed at identifying surface evidence of archaeological resources within the Project Site. Approximately 35 percent of the Project Site was subject to an opportunistic survey that targeted areas with exposed ground surface, such as landscaped areas, including the front lawn of the campus, and athletic fields. Ground surface visibility within the landscaped areas ranged from approximately 0-10 percent, due to grass and artificial turf that covered the unpaved ground. The remaining 65 percent of the Project Site was not surveyed as it is currently developed with buildings and pavement (asphalt and concrete). No archaeological resources were identified.

Subsurface Sensitivity Assessment

Prehistoric Archaeological Analysis

A total of five prehistoric archaeological resources have been recorded outside the 0.50-mile radius, but in close proximity to Centinela Creek, which demonstrates prehistoric occupation was a common occurrence in the vicinity of this creek. Given the Project Site's location in the vicinity of Centinela Creek (TopoView 2025), an unnamed Native American village in the vicinity (Kirkman 1938), and the "Old Salt Road" used by Native Americans (Kirkman 1938), the Project Site has the potential to retain buried prehistoric archaeological resources. Moreover, although the Project Site is developed, construction of the majority of existing buildings dating between the early 1910s to the 1960s would not likely have involved

particularly deep excavation that would have displaced archaeological resources. The only areas where deep excavation has taken place is Building A, which has a partial basement and Building P which has a pool. Additionally, in cases where later development does disturb native sediments, archaeological materials can become intermixed or redeposited within historic fill such as in the case with the two prehistoric metates encountered during monitoring (in the upper six feet of disturbed fill materials) in connection with a development project in Downtown Culver City located approximately 4.5 miles from the Project Site in a similar geologic setting and underneath buildings. Given these findings, there is at least a *moderate* potential for prehistoric archaeological materials to be encountered as a result of Project-related ground-disturbing activities.

Historical Archaeological Analysis

Per review of Sanborn maps, development at the Project Site began by at least the 1910s. The 1912 Sanborn map shows that Union High School and two outbuildings are located within the east central portion of the Project Site and several residential dwellings with outbuildings existed along the northernmost portion of the Project Site and south of Olive St. The 1922 Sanborn map shows that the school had been expanded and that approximately 15 residential dwellings with outbuildings and garages were located south of Olive St. and approximately 15 residential dwellings with outbuildings were situated west of S. Fir Ave. The 1950 Sanborn map shows that the residential dwellings along the northern, southern, and western portions of the Project Site had been removed. Approximately 75 percent of the Project Site is currently developed with buildings and pavement (concrete walkways, athletic facilities and a surface parking lot), while approximately the remaining 25 percent is covered by sod/grass. Building A is known to have a partial basement, while a portion of Building P is known to contain a pool. Therefore, if any resources once existed within Buildings A and P, these are likely to have been destroyed during deep excavations for the pool and basement. However, there is still potential for unearthing resources along the northwestern, southern and western portions of the Project Site, as these areas have not been subject to deep excavations and are not known to contain basements or pools. Currently the western portion is covered by sod and the southernmost portion is developed with some buildings and a surface parking lot. Pavement/parking lots have the potential to cap and preserve archaeological resources below the surface as excavations for these are typically shallow and would therefore not disturb or displace deeper archaeological resources, and the pavement could have served as a barrier that could have prevented further impacts to any such resources. Given the potential for past land uses [residential dwellings with outbuildings and garages] to have capped and sealed archaeological resources, the potential to encounter historic-period archaeological resources along the northwestern, southern, and western portions, is considered moderate to high.

4.3.3 Project Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to hazards and hazardous materials if it would:

- **Threshold CUL-1:** Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;
- **Threshold CUL-2:** Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or
- **Threshold CUL-3:** Disturb any human remains, including those interred outside of dedicated cemeteries.

Methodology

The analysis of impacts to archaeological resources is based on the Archeological Resources Report, included in Appendix D1 of this Draft EIR, which includes: (1) land use history research (review of historic maps, Sanborn maps, and aerial photographs); (2) a cultural resource records search conducted at the CHRIS-SCCIC to review recorded cultural resources within a 0.5-mile radius of Project Site, as well as a review of previous studies; (3) additional research on monitoring projects conducted in the vicinity of the current Project Site; (4) a SLF search through the NAHC; (5) geologic map review; (6) review of the Geotechnical Report for the Project; (7) a pedestrian survey; (8) and a subsurface sensitivity assessment.

The analysis of impacts to historic resources is based on the Historic Resources Assessment, included in Appendix D2 of this Draft EIR, which includes: (1) archival research including CHRIS-SCCIC records search findings for the built environment within a 0.25-mile radius of the Project Site in addition to a review of potential adjacent resources; (2) historic contexts for the Subject Property including: *History of Inglewood: Settlement, Development and Growth* (1822 - present); *Inglewood Unified School District: Early History, Establishment and Expansion* (1905 - present); *Secondary School Education in Inglewood, CA*, with the following sub-themes: *Post–1933 Long Beach Earthquake School Plants* (1933–1945); *Early Experiments in the Modern, Functionalist School Plant* (1933–1945); and *The Postwar Modern Functionalist School Plant* (1945–1969); *Architecture and Engineering*, with the following sub-themes: *Public Works Administration Moderne Style* (1929-1948) and *Late Moderne Style* (1937-1960); *Mid-Century Modernism/Regional Modernism* (1945-1960); and Industrial Utilitarian subthemes: *Daylight Factory* (1910-1940) and *Carpentry Shop* (1900-1965); (3) architectural resources survey results and architectural descriptions for the site and all historic-period buildings on the IHS campus; (4) significance evaluations for the campus and select buildings; and (5) findings and conclusions.

Project Design Features

The IHS campus includes a Mid-Century Modern entrance portico or arcade designed by H.L. Gogerty's firm Porter, Gogerty, Meston & Associates at the eastern edge of the campus, along S. Grevillea Avenue. This portico has been assigned a status code of "6L" meaning that it is not eligible for local historic designation but may still warrant special consideration in local planning. The 1950s entrance portico includes a movable metal gate system, a series of two flat overhangs supported by walls and metal poles,

and stylistic metal “INGLEWOOD HIGH SCHOOL” signage. The District would incorporate the original portico and signage into the new Project. The portico assembly would be rehabilitated in conformance with the SOI Standards. This may include the careful removal of the portico assembly, storage and reinstallation in a prominent location after construction efforts are completed or may include the preservation and protection of the portico in-situ during construction activities, followed by careful repair efforts as-needed upon the newly constructed Project. Original Gogerty plans and early photographs from the 1956 IHS yearbook would be referenced as a part of the portico rehabilitation effort. Upon Project completion, the portico assembly would remain visible to the public, in the same manner as it currently exists. To ensure conformance, plan reviews and design consultation/preservation consulting would occur at 50% and 100% design development and construction documents should be reviewed by a qualified architectural historian as per SOI Standards. The District would provide detailed development plans including final removal/installation methods, or rehabilitation methods, features, materials and finishes related to portico retention to ensure conformance with the SOI Standards.

There are no other Project Design Features related to cultural resources.

Analysis of Project Impacts

Threshold CUL-1: Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

Impact Analysis

Under CEQA 15064.5 (b), the changes to a building and its setting would cause a substantial adverse change if they would detract from the integrity (location, design, setting, materials, workmanship, feeling, association) of the historical resource such that the historical resource’s ability to convey its significance would be materially impaired to the degree that it would no longer be eligible as a historical resource pursuant to CEQA 15064.5 (a).

The analysis of direct impacts is focused on the potential for the Project to result in demolition, material alteration, relocation or conversion of a historical resource and/or important character-defining features. The impact analysis also considers the potential for the Project to cause indirect impacts due to alteration of the surroundings of an historical resource that could remove part or all of its associated setting, remove historic features or spaces surrounding the resource, or substantially impair or obscure the ability of the resource to convey its historical significance. The analysis of the potential for indirect impacts also involves ascertaining whether there is the potential for damage to proximate historic resources due to Project excavation and construction activities, including potential impacts related to vibration, settlement, or other effects.

The Project proposes the complete demolition of Buildings A, I, L, and M (in addition to Buildings B, C, D, E, F, G, H, J, K, M, N, Q, and S), the partial renovation of Buildings O, P, and R, in addition to the construction of six new buildings (see Figure 3-3, Existing Campus). The Project also proposes campus modernization improvements including considerations for the following: open space, utility, recreational landscaping, access, parking and circulation, and lighting and sound improvements. As discussed above, Buildings A, Building I, and Building M were determined to be individually eligible as a historical resource under the National Register at the local level and the California Register under criteria A/1 and

C/3. Additionally, Buildings M and L were determined to be contributors to a historic district, eligible under the National Register at the local level and the California Register. As such, these buildings are considered historical resources according to CEQA.

Direct Impacts

The Project proposes to demolish the majority of the existing campus, including historic Buildings A, I, L, and M in their entirety, while Buildings O, P, and R would be retained. Demolition would include the abatement of lead and asbestos materials, followed by building demolition of the four eligible historical resources, including the historic district. Demolition would be considered a substantial adverse change in the significance of a historical resource. Therefore, the implementation of the Project would result in a significant and unavoidable impact due to the permanent demolition of historic Buildings A, I, L, and M. Mitigation measures HIST-1 through HIST-4 are provided below to reduce these significant impacts; however, even with implementation of these mitigation measures, impacts will remain significant and unavoidable.

Indirect Impacts

Indirect impacts would occur if a substantial material change to the integrity and significance of a historical resource or potential historic sites located within 0.25 miles of the Project Site, especially those that have direct and indirect views of the proposed Project, would occur. Record searches identified two previously recorded historic resources within a 0.25-mile radius of the Project Site, both of which have direct views of the Project Site and have assigned status codes of 1CS and 2S2. Further, five potentially eligible historic resources that meet the age threshold of 45 years of age or older were identified as part of a desktop survey effort have direct and indirect views of the Project Site.

Implementation of the Project would result in slightly altered views of the Project Site from these locations. These seven historical resources were constructed between 1908 and 1973 and therefore reflect nearly seven decades of change within Inglewood, which developed rapidly in the years that followed World War II. The development as it exists today represents the various periods of construction surrounding the Project Site which has included agricultural development, the IHS campus, churches, and residential and associated commercial development.

The Lundeberg WPA Transportation Mural (19-186693), is a WPA mural located 0.02 miles (approximately 106 feet) east of the IHS campus. The mural has a status code of 1CS. Located in the northern extent of Grevillea Park, the mural is eight feet tall and extends 0.04 miles or 240 feet southward, paralleling the eastern extent of campus along Grevillea Avenue. The mural was originally created in 1940 and later relocated to its present site, where it was fully restored by 2001. The resource is a petrachrome mural that is a freestanding retaining wall. Of the proposed historic buildings to be demolished, Building A is located closest to the mural and is in the direct sideline of the mural. Due to the relocation of the mural from its original construction site in 1940, the resource's integrity of location has previously been altered. The mural was fully restored in 2001 and as such its design, materials, and workmanship have been reinstated after years of neglect. The Project would not alter the design, materials, or workmanship of the mural resource. Further, the mural is physically separated from the school campus by Grevillea Avenue and the physical setback from the sidewalk and parking areas.

The Inglewood Civic Center is a collection of Post Modern and Brutalist civic structures designed by Charles Luckman in 1973. The center is located 0.03 miles or 158 feet north of the IHS campus. The Civic Center has a status code of 2S2 and offers direct views of the northeastern portion of the IHS campus. The center was constructed after the historical resources at the IHS campus were built and are eligible due to their association with notable architect Charles Luckman and landscape architect Robert Herrick Carter. The center is self-contained as a potential historic district, which is physically separated from the IHS campus by Manchester Boulevard, and is somewhat obscured by landscaping. The location of the complex would remain the same upon Project completion, and the complex's setting would not be altered as its setting is largely dependent on the landscape design of the complex itself rather than external views. The Civic Center's association as a civic complex with multiple related buildings built in the 1970s would not be altered due to the demolition of the IHS campus or Buildings A, I, L or M or with the redevelopment of the Project Site. Further, the Civic Center's design, workmanship, and materials would not be modified with the campus demolition or redevelopment efforts upon Project completion.

The remaining four resources are located in the vicinity of the IHS campus in Inglewood and are as follows: 102 E. Kelso Street; 200 W. Kelso Street; 130 W. Kelso Street and 144 W. Kelso Street. The building at 102 E. Kelso Street is an altered Period Revival style church building, while the other buildings are all single-family residences. None of these four resources have assigned status codes, but they are considered presumptive resources for the purposes of this study. These resources are clustered along Kelso Street, approximately 106 feet to 370 feet south of the campus. As proposed, these properties located on Kelso Street are further away from the portions of the IHS campus that are proposed to be demolished and redeveloped. Building R, which will remain prominent along Kelso Street, is located closest to these resources, and it will not be demolished as part of the Project. The church and the residential structures face the direction of the IHS campus with direct and indirect views of the school's southern, more back-of house, extent. These four resources are separated from the Project Site by Kelso Street and limited landscaping. The proposed demolition and redevelopment of the IHS campus would be physically separated from the four resources and would not physically alter the buildings' location, design, materials, or workmanship, which appear to have been altered over time. The four resources were constructed prior to the development of the remaining early buildings on campus, Building A, constructed in 1925, which is proposed to be demolished. As such, the setting and feeling of these buildings have been modified over time, namely in the 1940s and 1950s, when the campus underwent significant redevelopment efforts. 102 E. Kelso Street; 200 W. Kelso Street; 130 W. Kelso Street and 144 W. Kelso Street are located in a portion of Inglewood that largely includes residential and commercial development, with the exception of the IHS campus, which has been used as civic property for over 100 years, and would continue to be used as such upon Project completion. The Project would not introduce a substantial new scale to the existing setting, as several of the current IHS buildings are two-stories in height, which would similarly be replaced with new two-story structures. Existing remaining Building R along Kelso Street would serve as a buffer to the new, contemporary school facilities as part of the Project, which would allow the Project to be further separated from these potential resources. Thus, the Project would not result in a substantial material change to the integrity of 102 E. Kelso Street; 200 W. Kelso Street; 130 W. Kelso Street and 144 W. Kelso Street, or their immediate surroundings that would detract from their ability to convey their significance.

Consequently, the minor change in views and setting would not detract from these resources' ability to convey their significance. No character-defining features of these resources would be changed or impacted at the conclusion of the Project. The Project would not have an identified physical or material effect on any of these resources. At the conclusion of the Project, the integrity of the resources' location, design, materials, workmanship, setting, ambiance, and association would remain intact, and these resources would not undergo a substantial material change. Therefore, indirect impacts of the Project to historical resources in the surrounding vicinity (0.25-mile radius with views of the Project Site) are less than significant because the Project would not materially impair these resources or their setting or interrupt primary views in a manner that would adversely affect the ability of these historical resources to convey their significance.

In addition to indirect impacts associated with views, indirect impacts associated with damage to historic structures from construction-related vibration may also result from Project implementation. However, as noted in the Project noise analysis (see Appendix G), backhoe excavation would produce the most extreme construction vibrations on site as part of the Project, which would be limited to the IHS campus. As such, these vibrations would be physically separated from the potential historic resources and no damage to off-site structures is anticipated to occur.

With implementation of the Project, the significance and integrity of these resources would remain intact and indirect impacts would be less than significant.

Mitigation Measures

Mitigation Measure HIST-1: HABS-Like Survey (In Process) – In order to document the campus and the eligible buildings Building A, Building I, Building L, and Building M prior to demolition and/or modification, a Historic American Building Survey (HABS)-like report shall be prepared. The Project is not under Federal jurisdiction and therefore preparation of a HABS-like report is proposed. Three HABS-like reports, documenting Building A, Building I, and Building M, and the IHS Industrial Historic District shall be prepared in accordance with HABS guidelines. The reports shall include high resolution digital photographs rather than large format black-and-white prints and would be archived in local and state repositories only, not sent to the Library of Congress. Principal photography shall include exterior contextual views, elevation views, and select interior views of significant spaces at Buildings A, I, M, and L in addition to limited general views of the IHS campus. A corresponding site plan/photo key with also be produced per National Park Service (NPS) format. The HABS-like photography will be completed in high-resolution digital format and printed on archival photo paper per NPS guidelines. Photography will be produced in high resolution digital capture. Written and graphic documentation of the campus, Buildings A, I, L, and M will be prepared per HABS Level II guidelines, which will provide a statement of significance, narrative histories, resource descriptions, and supporting documentation. The reports shall record the history of the subject property and Buildings A, I, L, and M, and their physical condition, both historic and current, through site plans, historic maps, and photographs, as well as current photographs, written data and text. Limited additional research will be conducted related to the original construction of each building and the role of each on the IHS campus. Hard copies of the approved documentation shall be submitted to the Inglewood Public Library, the Inglewood High School Library, and the City of Los Angeles Central Library where they will be publicly available, and a digital copy to the South Central Coastal Information Center (SCCIC) at California State University Fullerton, Department of Archaeology.

Mitigation Measure HIST-2: Interpretive Exhibit – An Interpretative Exhibit, which would promote cultural awareness of the history of Inglewood High School including its early Inglewood Highschool Farm, Post-Long Beach Earthquake redevelopment, defense program and wartime vocational training, and the unique histories of eligible Buildings A, I, M, and the IHS Industrial Historic District, shall be developed and be located at a prominent location as part of the Project. The Interpretive Exhibit shall be developed by a qualified architectural historian and shall include comprehensive historical information regarding the campus historic and eligible building and will be visually rich including photographs and other 2-dimension or 3-dimension IHS ephemera. Every effort shall be made to locate the exhibit in the entrance building or other publicly accessible location. The Interpretative Exhibit shall present a photographic history of the campus, Buildings A, I, M, and the IHS Industrial Historic District, and showcase other information that would educate students and staff about the evolution of the high school over the course of its roughly 110-year history. The Interpretative Exhibit shall be completed and open after the new development as part of the Project is placed in service. In this manner, information about the property's construction and design as well as the associated history, would be retained and preserved in perpetuity on site.

Mitigation Measure HIST-3: Book – A book comprehensively documenting the history of the Inglewood High School campus including the Inglewood Highschool Farm, Post-Long Beach Earthquake redevelopment, defense program and wartime vocational training, and the unique histories of eligible Buildings A, I, M, and the IHS Industrial Historic District, shall be developed. Utilizing the historical narrative developed for mitigation measure **HIST-1**, the book will include rich visual photographs, representative building plans, and other graphics depicting the character of the IHS campus, and the eligible Buildings A, I, M, and the IHS Industrial Historic District over time. The book shall be developed in a digital format that will be included on the Inglewood High School Unified School District's website for viewing and for digital download. Hard copies of the approved documentation shall be submitted to the Inglewood Public Library, the Inglewood High School Library, and the City of Los Angeles Central Library where they will be publicly available.

Mitigation Measure HIST-4: Campus Salvage Inventory (Completed) – In consultation with District staff and the Inglewood High School alumni group, a Campus Salvage Inventory plan was prepared which included the identification of features and ephemera located within the site and select buildings proposed to be demolished. The identified features include those that have cultural or historical value to the Inglewood High School alumni group, a volunteer organization of alumni who represent various graduation classes. The inventory is organized into a table with two phases: Phase 1 which indicates features that were removed in the Spring of 2025, and Phase 2 which indicates features that were removed after June 4, 2025. The table identifies features by an assigned asset number, feature name, a photograph of each feature, their original campus location, a brief feature description, suggested future placement location upon Project completion, and related notes regarding where a feature is currently stored or if another determination was made regarding feature commemoration, including preservation in-place or photo documentation prior to feature demolition. Prepared by the Inglewood High School Alumni Group, the table identifies select exterior campus site features including: four commemorative metal plaques, a sundial, flagpole, bronze bust status, in-situ mosaic tile array, a contemporary marquee sign, wood casework in Building A, Administration, and metal casework in Building R, Auditorium. Additionally, the inventory includes related high school ephemera such as sports trophies, newspaper clippings, spirit wear, certificates, a j-hook which would held a mirrored ball for dances, and annual yearbooks. Notable site features that were feasibly salvageable, in whole or in part, prior to demolition of the campus have been removed and are stored in the Inglewood Unified School District County Administrator's office or in District Office Storage. Salvaged

items may also be incorporated into interpretive displays within the school (if displayed in an appropriate, archival manner) or donated to museums or historical societies or other relevant organizations. The Campus Salvage Inventory will be updated upon Project completion to reflect any additional features identified and preserved during the demolition process, and to reflect final determinations regarding feature preservation, relocation, and/or demolition. A copy of the final Campus Salvage Inventory will be printed and included as an attachment to the version of the HABS-Like Survey as part of mitigation measure **HIST-1** to be placed in the Inglewood High School Library.

Level of Significance after Mitigation

With implementation of mitigation measures HIST-1 through HIST-4, impacts would continue to be significant and unavoidable as demolition would result in a permanent impact to historic resources.

Threshold CUL-2: The Project would have a significant impact if it were to cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

Impact Analysis

The subsurface archaeological sensitivity assessment indicates that the potential for encountering prehistoric archaeological resources is at least moderate based on the fact that five prehistoric archaeological resources have been recorded in close proximity to Centinela Creek, and an unnamed Native American village and the "Old Salt Road" used by Native Americans are located in the vicinity of the Project Site. Moreover, although the Project Site is developed, construction of the majority of existing buildings dating between the early 1910s to the 1960s would not likely have involved particularly deep excavation (except for Building A, which has a partial basement and Building P which has a pool). Additionally, in cases where later development does disturb native sediments, archaeological materials can become intermixed or redeposited within historic fill such as in the case with the two prehistoric metates encountered during monitoring (in the upper six feet of disturbed fill materials) in connection with a development project in Downtown Culver City located approximately 4.5 miles from the Project Site in a similar geologic setting and underneath buildings.

The subsurface archaeological sensitivity assessment indicates that the potential for encountering historic-period archaeological resources is moderate to high (due to the past land uses, including residential dwellings with outbuildings and garages) within the northwestern, southern and western portions of the Project Site, as these areas have not been subject to deep excavations and are not known to contain basements or pools. Therefore, construction activities associated with the Project could potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 and impacts would be potentially significant. Implementation of mitigation measures CUL-1 through CUL-3 would result in less than significant impacts with mitigation incorporated.

Mitigation Measures

Mitigation Measure CUL-1: Prior to ground disturbing activities, the District shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring

shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated, and the depth of excavation, and if found, the abundance and type of archaeological resources encountered, as determined by the Qualified Archaeologist. The frequency of monitoring shall be determined based on the factors presented above and can be reduced to part-time inspections. The monitoring can also be ceased as determined appropriate by the Qualified Archaeologist if older Quaternary alluvium sediments (not conducive to retaining prehistoric archaeological resources) are encountered. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.

Mitigation Measure CUL-2: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, Native American artifacts or features, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by the Qualified Archaeologist and a Gabrielino Tribe. If the resources are Native American in origin, the Gabrielino Tribe shall consult with the District and Qualified Archaeologist regarding the treatment and curation of any prehistoric archaeological resources. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the District to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall incorporate the Gabrielino Tribe's treatment and curation recommendations. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material and/or the Gabrielino Tribe. If no institution or the Gabrielino Tribe accept the resources, they may be donated to a local school or historical society in the area for educational purposes.

Mitigation Measure CUL-3: Upon completion of the archaeological monitoring, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted to the District, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

Level of Significance after Mitigation

With implementation of mitigation measures CUL-1 through CUL-3, impacts would be Less than Significant.

Threshold CUL-3: Disturb any human remains, including those interred outside of dedicated cemeteries.

As discussed in the Initial Study (Appendix A1), a number of regulatory provisions address the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code Section 7050.5, Public Resources Code (PRC) Section 5097.98, and State CEQA Guidelines Section 15064.5(e). Compliance with these regulatory protocols would ensure that impacts on human remains would be less than significant. Thus, the Project would have a less than significant impact with respect to Threshold CUL-3 and no further analysis is required.

Mitigation Measures

Impacts to human remains were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts related to human remains would be less than significant without mitigation.

Cumulative Impacts

Impact Analysis

Historical Resources

Construction impacts to historical resources, both direct and indirect, tend to be site specific. However, cumulative impacts can occur if a project and other related projects in the adjacent area would cumulatively affect in an adverse manner the eligibility of a historical resource and/or resources. A significant impact would occur if related projects adversely affect or detract from the integrity such that a historical resource or district would be no longer eligible for listing. In assessing cumulative impacts on historical resources, the focus is on related projects that are in the immediate vicinity of the Project that have the potential to contribute to changes in the setting of identified historical resources on the Project Site and in the vicinity, including historic districts.

Of the related projects identified in Chapter 2, *Environmental Setting*, of this Draft EIR, one development project is planned in the immediate vicinity of the Project Site. Located at 317 S. La Brea Avenue, 0.03-miles east of the IHS Campus and along S. Grevillea Avenue, the La Brea Apartments project would include the demolition of an existing two-story commercial building and the development of the adjacent surface parking lot, located to the south of Grevillea Park. The proposed La Brea Apartments project would involve the construction of a mixed-use development consisting of a four-story western volume and an eight-story eastern volume designed in a contemporary style.

The proposed development would abut Grevillea Park, which extends from W. Manchester Boulevard to W. Kelso Street and includes one listed historical resource, the WPA Transportation Mural (P-19-186693), which is described above. A site visit in October 2025 confirmed that work has not begun

to demolish the existing structure at 317 S. La Brea Avenue, nor has construction began. According to the proposed timeline for the Project, it is possible that the two projects may be ongoing simultaneously. However, as described above, views to and from the WPA Transportation Mural would be altered due to new development on the campus and also due to the proposed mixed-use development, but the mural's character-defining features would not be affected by the construction of the La Brea Apartments project.

As detailed in the indirect impact analysis provided above, the Project's indirect effects on identified or potential historical resources would not meaningfully detract from their visibility or prominence, or from their integrity of setting, feeling or association. Similar to the Project, the indirect effects of the other related project in the vicinity would not cumulatively detract from views to the adjacent historical resources or adversely affect their ability to convey their significance. However, as Buildings A, I and M, in addition to the IHS Industrial Historic are proposed to be demolished as part of the Project, cumulative impacts from the perspective of demolition or alteration of a historic resource would be significant and unavoidable. For these reasons, the Project, considered together with the one related project, would contribute considerably to a cumulatively significant impact on historical resources.

Archaeological Resources

Many of the related projects identified in Chapter 2, *Environmental Setting*, of this Draft EIR, would require excavation that could potentially expose or damage potential archaeological resources. However, these related projects are located in developed urban areas with sites that have been previously disturbed, and the potential to encounter and cause a significant impact on surface resources is unlikely. Further, in association with CEQA review, and depending on the depth of excavation and sensitivity of respective sites, mitigation measures or conditions of approval would be required for related projects that have the potential to cause significant impacts to undiscovered archaeological resources, including existing regulations for undiscovered human remains. Implementation of such mitigation measures, conditions of approval, and compliance with regulations would avoid significant impacts. State requirements regarding impacts on archaeological resources and CEQA compliance require monitoring of excavation activities and treatment and/or curation of discovered resources where appropriate (Public Resources Code Section 15064.5). Such standard construction practices, particularly over a range of project sites, provide for protection, recovery and curation of discovered resources and preserve their contributions to the knowledge base of past population activity in the area. For those projects not subject to CEQA review, there would be some potential for impacts on archaeological resources and human remains in the event there are excavations that extend into soils conducive to retaining resources, however, regulations contained in the California Health and Safety Code and Penal Code would apply in some instances, and circumstances involving a loss of such resources are expected to be limited. Therefore, the cumulative effects from cumulative projects are considered less than significant.

The Project is required to comply with the Mitigation Measures CUL-1 through CUL-3 and regulations cited above in the event resources are found, thus ensuring proper identification, treatment and preservation of any resources, and reducing significant impacts on archaeological resources and human remains to less than significant levels. These regulations require excavation monitoring, and treatment and curation of discoveries. Therefore, to the extent impacts on archaeological resources from cumulative projects may occur, further contribution from the Project would not be cumulatively considerable, and the cumulative impacts of the Project would be less than significant.

Mitigation Measures

Cumulative impacts to historic and archaeological resources and human remains were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Cumulative impacts related to historical and archaeological resources and human remains would be less than significant without mitigation.

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4.4 Energy

4.4.1 Introduction

This section analyzes effects on energy resources due to construction and operation of the Project. The Project's anticipated energy use is estimated, the potential for impacts due to inefficient or unnecessary consumption, or conflicts with energy related plans are assessed, and conservation measures are considered to address significant impacts if identified. Information found herein, as well as other aspects of the Project's energy implications, are discussed elsewhere in this Draft EIR, including in Chapter 2, *Project Description*, and Sections 4.2, *Air Quality*; 4.6, *Greenhouse Gas Emissions*; and 4.8, *Transportation*. Details regarding the energy calculations are provided in energy consumption worksheets provided in Appendix E of this Draft EIR.

4.4.2 Environmental Setting

Regulatory Framework

Federal

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national greenhouse gas (GHG) emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting mandatory Renewable Fuel Standards (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the U. S. Environmental Protection Agency (USEPA) and the National Highway Traffic Safety Administration (NHTSA) actions described above (refer to Corporate Average Fuel Economy Standards, above) (i) establishing miles per gallon targets for cars and light trucks and (ii) directing NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[1]

[1] A "green job," as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

Corporate Average Fuel Economy Standards

Established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) Standards (49 CFR Parts 531 and 533) reduce energy consumption by increasing the fuel economy of cars and light trucks (see Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR, for additional details). In February 2022 and April 2024, USEPA issued two sets of regulations for vehicles beginning with model years 2023 and through 2026 and model years 2027 through 2032 that are expected to result in average fuel economy label values of 40 miles per gallon (mpg) compared to the 32 mpg standards they replace. [2,3]

On June 7, 2024, the NHTSA announced the Final Rule for CAFE Standards, setting fuel efficiency targets for passenger cars, light trucks, and HDPUVs. By MY2031, fleet averages must reach 50.4 mpg for passenger cars and light trucks, and by MY 2035, HDPUVs must average 2.851 gallons per 100 miles. The rule introduces annual efficiency increases: 2% for passenger cars (MYs 2027–2031) and light trucks (MYs 2029–2031), and 10% for HDPUVs (MYs 2030–2032), followed by 8% (MYs 2033–2035).[4]

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 USEPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. Building on the first phase of standards, in August 2016, USEPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency, a 5 to 25 percent reduction over 2017 baseline, and cut carbon pollution. The Phase 2 standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons.[5]

Additional details regarding vehicle fuel economy standards are provided in Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR.

Federal Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 (EPCA) is a United States Act of Congress that responded to the 1973 oil crisis by creating a comprehensive approach to federal energy policy. The primary goals of EPCA are to increase energy production and supply, reduce energy demand, provide energy efficiency, and give the executive branch additional powers to respond to disruptions in energy supply. Most notably, EPCA established the Strategic Petroleum Reserve, the Energy Conservation Program for Consumer Products, and Corporate Average Fuel Economy regulations.

State

Senate Bill 1389

Senate Bill (SB) 1389 (Public Resources Code [PRC] Sections 25300–25323; SB 1389) requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors

2 USEPA, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards: Regulatory Update, December 2021.

3 USEPA, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards: Regulatory Update, December 2021.

4 National Highway Traffic Safety Administration (NHTSA), 2024. Corporate Average Fuel Economy. https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy#75896. Accessed February 2025.

5 USEPA, 2016. Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, 2016. https://www.govinfo.gov/content/pkg/FR-2016-10-25/pdf/2016-21203.pdf. Accessed February 2025.

and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety (PRC Section 25301[a]). The 2023 Integrated Energy Policy Report provides the results of the CEC's assessments related to energy sector trends, building decarbonization and energy efficiency, zero-emission vehicles (ZEV), energy equity, climate change adaptation, electricity reliability in Southern California, natural gas assessment, and electricity, natural gas, and transportation energy demand forecasts.

California's Renewable Portfolio Standard

First established in 2002 under SB 1078, California's Renewable Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent by 2020 and 50 percent by 2030.[6]

On September 10, 2018, Governor Jerry Brown signed SB 100, which further increased California's RPS and requires retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. It also requires the California Air Resources Board (CARB) to plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045. Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for details regarding this regulation.

California Building Standards Code (Title 24)

Building Standards Code and California Green Building Standards Code

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The 2022 Title 24 standards improve upon the prior 2019 Title 24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings.

In September 2024, the CEC approved the 2025 California Building Energy Efficiency Standards, which would go into effect on January 1, 2026. The 2025 standards build on the 2022 standards by aiming to decarbonize buildings by encouraging energy efficiency, solar and battery storage, and shifting times of energy use by expanding heat pump requirements for space and water heating in more building types, including low-rise multifamily units. It also introduces stronger electric-ready mandates to ease future transitions to electric appliances.[7] Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding these standards.

[6] California Public Utilities Commission (CPUC), California Renewable Portfolio Standards (RPS), https://www.cpuc.ca.gov/rps/. Accessed March 2025.

[7] California Energy Commission (CEC), 2025 California Energy Code Fact Sheet. https://www.energy.ca.gov/sites/default/files/2024-09/2025_California_Energy_Code_Fact_Sheet_ada.pdf. Accessed January 2025.

California Health and Safety Code (HSC), Division 25.5, California Global Warming Solutions Act of 2006

In 2006, California adopted AB 32 (codified in the California Health and Safety Code [HSC], Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020.

In 2016, California adopted SB 32 and its companion bill, AB 197, which amended HSC Division 25.5 and established a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and included provisions to ensure that the benefits of state climate policies reach into disadvantaged communities. SB 32 and AB 197, while focused on reducing GHG emissions, have co-benefits for increasing energy efficiency. Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for details regarding these regulations.

Senate Bill 350

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of Executive Order B-30-15. Building off of AB 32, SB 350 established California's 2030 GHG reduction target of 40 percent below 1990 levels. To achieve this goal, SB 350 set ambitious 2030 targets for energy efficiency and renewable electricity, among other actions aimed at reducing GHG emissions. SB 350 increased California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030 prior to the current goals set by SB 100. In addition, SB 350 requires the State to double statewide energy efficiency savings in electricity and natural gas end uses by 2030.

California Air Resources Board

CARB's Advanced Clean Car Program

The Advanced Clean Cars emissions-control program that requires a greater number of zero-emission vehicle models for years 2015 through 2025 to control smog, soot and GHG emissions (see Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR, for additional details). This program includes the Low-Emissions Vehicle (LEV) regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles; and the ZEV regulations to require manufacturers to produce an increasing number of pure ZEVs (meaning battery and fuel cell electric vehicles) with the provision to produce plug-in hybrid electric vehicles (PHEV) between 2018 and 2025. In particular, implementation of the ZEV and PHEV regulations reduce transportation fuel consumption by increasing the number of vehicles that are partially or fully electric-powered.

The primary mechanism for achieving the ZEV target for passenger cars and light trucks is CARB's Advanced Clean Cars II (ACC II) Program. The ACC II regulations will focus on post-2025 model year light-duty vehicles, as requirements are already in place for new vehicles through the 2025 model year. On December 18, 2024, the USEPA granted the waiver to CARB, enabling the implementation and enforcement of the Advanced Clean Cars II Regulations which target model years 2026 through 2035 for light- and medium-duty vehicles and revises the California Low Emission Vehicle (LEV) and ZEV standards. CARB anticipates reductions in pollutants such as fine PM2.5, NO_X, hydrocarbons (HC), GHG, and toxic air contaminants.

Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

In 2004, the CARB adopted an Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling in order to reduce public exposure to diesel particulate matter emissions (CCR Title 13, Section 2485). This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given location. While the goal of this measure is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from unnecessary idling.

Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen, and Other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles

In 2007, CARB approved the "In-Use Off-Road Diesel Fueled Fleets Regulation" to reduce emissions from existing (in-use) off-road diesel vehicles that are used in construction and other industries. This regulation establishes emission rates targets for the off-road vehicles that decline over time to accelerate turnover to newer, cleaner engines and require exhaust retrofits to meet these targets. While the goal of this regulation is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from the use of more fuel-efficient engines. Refer to Section 4.2, *Air Quality*, of this Draft EIR for details regarding these regulations.

Sustainable Communities Strategy

Adopted by the State on September 30, 2008, the Sustainable Communities and Climate Protection Act of 2008, or SB 375, establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Pursuant to SB 375, in April 2024, SCAG adopted the 2024–2050 RTP/SCS, referred to as Connect SoCal 2024, which is an update to the previous Connect SoCal 2020. Compliance with and implementation of Connect SoCal 2024 policies and strategies would have the co-benefits of reducing per capita vehicle miles travelled (VMT) and corresponding decreases in per capita transportation-related fuel consumption.

Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for details regarding these applicable policies and strategies.

California Environmental Quality Act

In accordance with CEQA and Appendix F, *Energy Conservation*, of the CEQA Guidelines, in order to assure that energy implications are considered in project decisions, EIRs are required to include a discussion of the potential significant energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Appendix F of the CEQA Guidelines provides a list of energy-related topics that should be analyzed in the EIR. In addition, while not described or required as significance thresholds for determining the significance of impacts related to energy, Appendix F provides the following topics that the lead agency may consider in the discussion of energy use in an EIR, where topics are applicable or relevant to project:

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

- The effects of the project on local and regional energy supplies and on requirements for additional capacity;
- The effects of the project on peak and base period demands for electricity and other forms of energy;
- The degree to which the project complies with existing energy standards;
- The effects of the project on energy resources;
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.
- The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.
- Whether the Project conflicts with adopted energy conservation plans.

Regional

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

SB 375 requires each Metropolitan Planning Organization (MPO) to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plan. In general, the SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce vehicle miles traveled from automobiles and light duty trucks and thereby reduce GHG emissions from these sources. For the SCAG region, Connect SoCal 2024 (the 2024–2050 RTP/SCS), adopted on April 4, 2024, is the current RTP/SCS and is an update to the 2020–2045 RTP/SCS. Connect SoCal 2024 focuses on the continued efforts of the previous RTP/SCS plans for an integrated approach in transportation and land use strategies in development of the SCAG region through horizon year 2050. Connect SoCal 2024 estimates that the SCAG region will reduce VMT per capita for the year 2050 by 6.2 percent compared to baseline conditions for the year. Connect SoCal 2024 centers on maintaining and better managing the transportation network for moving people and goods while expanding mobility choices by location housing, jobs, and transit closer together, and increasing investments in transit and complete streets. Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding these requirements.

Local

City of Inglewood General Plan

The City General Plan Environmental Justice Element contains policies and goals related to General Environmental Health, Access, and Connectivity. The following goals and measures would be relevant to the Project.

Section 2: Land Use and Environment

> **Policy EJ-2.4:** Create land use patterns and public amenities that encourage people to walk, bicycle and use public transit.
>
> **Policy EJ-2.8:** Encourage new development to reduce vehicle miles traveled to reduce pollutant emissions.

Policy EJ-2.10: Implement and periodically update the City's Energy and Climate Action Plan to improve air quality and reduce greenhouse gas emissions.

Policy EJ-2.27: Enforce the state's 5-minute maximum idling limitation for sleeper diesel trucks and trucks with a gross vehicle weight rating over 10,000 pounds.

Section 3: Mobility and Active Living

Policy 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.

Policy EJ-3.2: Facilitate pedestrian and bicycle access to parks and open space through infrastructure investments and improvements.

Policy EJ-3: Partner with the Inglewood Unified School District and non-profit organizations to improve access to bicycles, helmets, and related equipment for lower income families.

Policy EJ-3.4: Require the provision of on-site bicycle facilities in new large-scale development projects.

City of Inglewood Energy Efficiency Climate Action Plan

The City adopted the Energy Efficiency Climate Action Plan (EECAP) in 2015 as an update to the 2013 EECAP. Within the EECAP, strategies and measures are identified to tackle Citywide energy usage and GHG emissions. The following goals and measures would be relevant to the Project.

Goal 3: Increase Energy Efficiency in Existing Commercial Units.

Measure 3.4: Promote or require commercial energy retrofits.

Goal 4: Increase Energy Efficiency in New Commercial Development.

Measure 4.1: Encourage or require EE standards exceeding Title 24.

Goal 5: Increase Energy Efficiency through Water Efficiency.

Measure 5.1: Promote or require WE through SBX7-7.

Goal 6: Decrease Energy Demand through Reducing Urban Heat Island Effect.

Measure 6.1: Promote Tree Planting for Shade and EE.

Measure 6.2: Incentivize or require light-reflecting surfaces.

Existing Conditions

Existing Electricity Sales

Electricity, as a consumptive utility, is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components

for distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid.

Energy capacity, or electrical power, is generally measured in watts (W), while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for 1 hour would be 100 Wh. If ten 100 W bulbs were on for 1 hour, the energy required would be 1,000 Wh or 1 kilowatt-hour (kWh). On a utility scale, the capacity of a generator is typically rated in megawatts (MW), which is 1 million W, while energy usage is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is 1 billion Wh.

SCE provides electrical services to approximately 15 million people, 15 counties, 180 incorporated cities including Inglewood and the Project Site, 5,000 large businesses, and 280,000 small businesses throughout its 50,000-square-mile service area, across central, coastal and southern California, an area bounded by Mono County to the North, Ventura County to the West, San Bernardino County to the East, and Orange County to the South.[8] SCE produces and purchases energy from a mix of conventional and renewable generating sources.

SCE generates power from a variety of energy sources, including large hydropower (greater than 30 MW), coal, gas, nuclear sources, and renewable resources, such as wind, solar, small hydropower (less than 30 MW), and geothermal sources. The annual electricity sale to customers in 2024 was approximately 81,841,000 MWh.[9] See **Table 4.4-1** for a summary of energy use for the region, including the SCE service area.

TABLE 4.4-1
EXISTING ANNUAL REGIONAL ENERGY USE

Source	Amount
Electricity (SCE service area)[a]	81,841,000 MWh
Natural Gas (SoCalGas service area)[b]	2,307,000,000 cf
Gasoline (Los Angeles County)[c]	3,039,000,000 gallons
Diesel (Los Angeles County)[c]	443,425,076 gallons

Sources:

a. Edison International and Southern California Edison (SCE), 2024 Annual Report, 2025, page 2, https://download.edison.com/406/files/202503/2024-eix-sce-annual-report.pdf. Accessed August 2025.
b. California Gas and Electric Utilities, 2024 California Gas Report, page 165, https://www.socalgas.com/sites/default/files/2024-08/2024-California-Gas-Report-Final.pdf. Accessed August 2025.
c. CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Year 2023 Results.

SCE is required to commit to the use of renewable energy sources for compliance with the Renewable Portfolio Standards. As shown in **Table 4.4-2**, SCE procures 37.6 percent of its energy portfolio from renewable sources. Senate Bill (SB) 350 (Chapter 547, Statues of 2015) and SB 100 (Chapter 312, Statutes of 2018) further increased California's Renewable Portfolio Standards and requires retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail

[8] Southern California Edison (SCE), Who We Are, https://www.sce.com/about-us/who-we-are. Accessed March 2025.

[9] Edison International and SCE, 2024 Annual Report, 2025, page 2, https://download.edison.com/406/files/202503/2024-eix-sce-annual-report.pdf . Accessed August 2025.

sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. The legislation also instructed CARB to plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.[10] SCE anticipates it will meet its own climate change and renewables objectives that align with SB 100's 2045 renewables requirement.[11]

TABLE 4.4-2
ELECTRIC POWER MIX DELIVERED TO RETAIL CUSTOMERS IN 2023

Energy Resource	2023 SCE	2023 CA Power Mix (for comparison)
Eligible Renewable	**37.6%** [a]	**36.9%** [a]
Biomass & bio-waste	0.1%	2.1%
Geothermal	5.2%	4.8%
Eligible hydroelectric	0.7%	1.8%
Solar	19.8%	17.0%
Wind	11.7%	11.2%
Coal	**0.0%**	**1.8%**
Large Hydroelectric	**4.5%**	**11.7%**
Natural Gas	**20.0%**	**36.6%**
Nuclear	**9.1%**	**9.3%**
Other	**0.1%**	**0.1%**
Unspecified sources of power [b]	**28.8%**	**3.7%**
Total	**100%**	**100%**

Notes:
a. Percentages are estimated annually by the CEC based on the electricity sold to California consumers during the previous year.
b. "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources.

Sources: CEC, 2023 Power Content Label, Southern California Edison, https://www.energy.ca.gov/filebrowser/download/7362, Accessed August 2025.

Existing Natural Gas Supply

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs and delivered through high-pressure transmission pipelines. Natural gas provides almost one-third of the State's total energy requirements. Natural gas is measured in terms of both cubic feet (cf) or British thermal units (Btu).

Natural gas is used for cooking, space heating, water heating, electricity generation, and as an alternative transportation fuel. The Project Site is served by the Southern California Gas Company (SoCalGas), which is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.1 million customers in more than 500

[10] California Legislative Information, Senate Bill 100, California Renewable Portfolio Standards Program: Emissions of Greenhouse Gases, Approved by Governor on September 10, 2018, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB100. Accessed March 2025.

[11] Edison International and SCE, 2022 Annual Report, 2022, page 159.

communities encompassing approximately 24,000 square miles throughout central and southern California, from the City of Visalia to the US/Mexican border.[12]

SoCalGas, along with five other California utility providers, released the 2024 California Gas Report, presenting a forecast of natural gas supplies and requirements for California through the year 2040. The 2024 California Gas Report predicts gas demand for all sectors (residential, commercial, industrial, energy generation and wholesale exports) and presents best estimates, as well as scenarios for hot and cold years. Overall, SoCalGas predicts a decrease in natural gas demand in future years due to a decrease in per capita usage, energy efficiency policies, and the State's transition to renewable energy displacing fossil fuels including natural gas.[13]

SoCalGas receives gas supplies from several sedimentary basins in the western United States (US) and Canada, including supply basins located in New Mexico (San Juan Basin), west Texas (Permian Basin), the Rocky Mountains, and western Canada as well as local California supplies.[14] Sources of natural gas in the southwestern US will continue to supply most of SoCalGas' natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and Canadian sources provide only a small share of SoCalGas supplies due to the high cost of transport.[15] Gas supply available to SoCalGas averaged 2,307 million cf per day in 2024. This equates to an annual average of 842,055 million cf per year.[16] See Table 4.4-1 for a summary of energy use for the region, including the SoCalGas service area.

Existing Transportation Energy

The annual transportation fuel consumption of diesel and gasoline in 2023 for California (the most recent year for which Statewide data is available) is 2,316 million gallons and 13,576 million gallons respectively. Transportation fuel consumption of diesel and gasoline for Los Angeles County in 2023 is 443.4 million gallons and 3,039 million gallons, respectively. The estimated Los Angeles County and Statewide transportation fuel consumption is based on retail sale data from the CEC.[17] See Table 4.4-1 for a summary of Los Angeles County fossil fuel consumption in 2023.

The State is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT. Accordingly, gasoline consumption in California has declined. The CEC predicts that the demand for gasoline will continue to decline over the next 10 years, and there will be an increase in the use of alternative fuels.[18]

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12 SoCalGas, Company Profile, https://www.socalgas.com/about-us/company-profile. Accessed August 2025.

13 California Gas and Electric Utilities, 2024 California Gas Report.

14 California Gas and Electric Utilities, 2024 California Gas Report.

15 California Gas and Electric Utilities, 2024 California Gas Report.

16 California Gas and Electric Utilities, 2024 California Gas Report.

17 CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2023, https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting. Accessed August 2025.

18 CEC, 2023 Integrated Energy Policy Report, February 2024, page 228, https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report-iepr/2023-integrated-energy-policy-report. Accessed August 2025.

Existing Project Site

The Project Site is currently occupied by Inglewood High School. The primary campus development is situated in the eastern portion of campus and consists of classroom and administrative buildings. Currently, athletic courts and fields are located on the western portion of the campus. Energy demand associated with the existing site would include electricity, natural gas, and fuel consumption from vehicle trips. However, in order to provide a conservative analysis, no credit is taken for existing energy consumption and the Project's energy consumption is conservatively considered new. Therefore, energy consumption from the Project would be less than those presented in the sections below as it does not include a reduction of the existing energy consumption under existing conditions.

4.4.3 Environmental Impacts

Thresholds of Significance

The following thresholds of significance are based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would result in significant adverse impacts related to Energy if it would:

- **Threshold ENE-1** Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- **Threshold ENE-2** Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in Appendix G and Appendix F of the CEQA Guidelines, as appropriate, to assist in answering the Appendix G questions. The factors to evaluate energy impacts under Threshold ENE-1 include:

1) The Project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the Project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
2) The effects of the Project on local and regional energy supplies and on requirements for additional capacity;
3) The effects of the Project on peak and base period demands for electricity and other forms of energy;
4) The effects of the Project on energy resources; and
5) The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

In accordance with Appendix G and Appendix F of the CEQA Guidelines, the degree to which the Project complies with existing energy standards is considered, as appropriate, to evaluate impacts under Threshold ENE-2.

Methodology

Construction

Project construction is estimated to start in 2026. Anticipated construction activities would vary substantially from day to day, depending on the specific type of construction activity and the number of workers and vendors traveling to the Project Site. This analysis considers these factors and provides the estimated maximum construction energy consumption for the purposes of evaluating the associated impacts on energy resources. This analysis is based on estimated maximum construction activities, meaning that for each phase of construction it was assumed that all of the vehicles and equipment that could be used for that phase are in simultaneous use for all day and every day of the phase.

Electricity

Construction electricity was estimated for a temporary construction office, for construction equipment that would use electricity as an alternative to diesel fuel, and for water usage from dust control. The construction office was assumed to be a 2,000-square-foot trailer and was modeled using CalEEMod (version 2022.1).[19] In addition, electricity from water conveyance for dust control was also calculated based on the estimated water consumption rate per day and assuming that water used for construction is non-potable and delivered on-site by trucks to cover the area during construction activity. Region-specific water electricity intensity factors for recycled non-potable water generation and conveyance were used to convert the volume of water needed to electricity demand from water conveyance.[20]

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas is not expected to be consumed during Project construction. Therefore, natural gas associated with construction activities was not calculated.[21]

Transportation Fuels

Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix and usage factors provided in the CalEEMod construction output files included in Appendix C of this Draft EIR. The total horsepower was then multiplied by fuel usage estimates per horsepower-hour from CARB's off-road vehicle (OFFROAD) model. Fuel consumption from construction on-road worker, vendor, concrete and delivery/haul trucks was calculated using the trip rates and distances provided in the CARB CARB on-road vehicle emissions factor (EMFAC2021) model modeling worksheets. Total VMT for these on-road vehicles were then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor using CARB's EMFAC2021 model. EMFAC provides the total annual VMT and fuel consumed for each vehicle type. CalEEMod assumed trip lengths were used for worker commutes and vendor, concrete and

[19] California Air Pollution Control Officers Association, California Emissions Estimator Model, 2022, http://caleemod.com/. Accessed March 2025.

[20] Next 10 and Pacific Institute, The Future of California's Water-Energy-Climate Nexus, Table 4.

[21] In general, natural gas would not be expected to be used and this energy analysis assumes heavy-duty construction equipment is diesel-fueled, as is typically the case. However, natural gas-fueled heavy-duty construction equipment could be used to replace some diesel-fueled heavy-duty construction equipment. If this does occur, diesel fuel demand would be slightly reduced and replaced by a small amount of temporary natural gas demand. This would not substantially affect the energy analysis or conclusions provided herein.

delivery trips while demolition debris and haul truck trips lengths were based on information provided by the client.

The energy usage required for Project construction has been estimated based on the number and type of construction equipment that would be used during Project construction by assuming a conservative estimate of construction activities (i.e., maximum daily equipment usage levels). Energy for construction worker commuting trips has been estimated based on the expected number of workers for the various phases of construction and the estimated VMT based on the conservative values in the CalEEMod and EMFAC2021 models. The assessment also includes a discussion of the Project's compliance with relevant energy-related regulatory requirements that would minimize the amount of energy usage during construction. These measures are also discussed in Chapter 3, *Project Description*, Section 4.2, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR.

The construction equipment and haul trucks would likely be diesel-fueled, while the construction worker commute vehicles would primarily be gasoline-fueled. For the purposes of this assessment, it is conservatively assumed that all heavy-duty construction equipment and haul trucks would be diesel-fueled. The estimated fuel economy for heavy-duty construction equipment is based on fuel consumption factors from the CARB OFFROAD emissions model, which is a State-approved model for estimating emissions from off-road heavy-duty equipment. The estimated fuel economy and fuel consumption for haul trucks and worker commute vehicles is based on fuel consumption factors from the CARB EMFAC 2021 emissions model. Both OFFROAD and EMFAC are incorporated into CalEEMod.

Operation

During operation of the Project, electricity and natural gas would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; water conveyance, and the use of electronics, equipment, and appliances for the new buildings, repaired buildings and sitewide improvements. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As noted above, in order to provide a conservative analysis, no credit is taken for existing energy consumption and the Project's energy consumption is conservatively considered new. Therefore, energy consumption from the Project would be less than those presented in the sections below as it does not include a reduction of the existing energy consumption under existing conditions.

Electricity

The Project's estimated electricity demand was analyzed relative to SCE's existing and planned energy supplies in 2028 (i.e., the Project buildout year) to determine if the utility would be able to meet the Project's energy demands. Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) from Project operation of the education and recreational uses were calculated using demand factors provided in CalEEMod, which are based on consumption estimates from the CEC's 2018–2030 Uncalibrated Commercial Sector Forecast and the 2019 Residential Appliance Saturation Survey. As explained in Appendix D, *Technical Source Documentation for Emissions Calculations*, of the CalEEMod User Guide, although the Commercial Forecast and RASS were both completed for 2019, that does not mean the energy intensity estimates derived from these datasets are representative of buildings constructed in compliance with the energy efficiency requirements of the 2019 or 2022 Energy Code. Therefore, the default energy consumption estimates provided in CalEEMod are

very conservative, overestimating expected energy use compared to what would be expected for new buildings subject to the latest Energy Code with more stringent energy efficiency measures. The 2022 Title 24 standards are in effect as of January 1, 2023 and the 2025 Title 24 standards would go into effect on January 1, 2026; therefore, the analysis likely conservative and overestimates Project operational building energy demand. Additional electricity usage related to the recreational uses, including the sports fields, courts and landscaped areas, was estimated in the Project's Illumination Study and incorporated in CalEEMod.[22]. Energy usage from water demand (e.g., electricity used to supply, convey, treat, and distribute) was generated with Caleemod defaults based on total building square footage, as well as the landscaped areas. The assessment also includes a discussion of the Project's compliance with relevant energy-related regulations and its land use transportation characteristics that would minimize the amount of energy usage during operations. These features and characteristics are also discussed in Chapter 3, *Project Description*, Section 4.2, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR.

Natural Gas

The Project's estimated natural gas demand was analyzed relative to SoCalGas' existing and planned energy supplies in 2028 (i.e., the Project buildout year)[23] to determine if the utility would be able to meet the Project's energy demands. Natural gas demand for the Project would be generated mainly by building heating and appliances.

Transportation Fuels

As discussed in detail in Section 4.8, *Transportation*, and the Project's VMT Assessment provided trip generation estimates for the Project's land uses. [24] The trip generation rates were incorporated into CalEEMod, and in combination with default trip lengths, an estimation of an annual VMT was provided. The Project's annual VMT was used to calculate the Project's estimated consumption of transportation fuels, based on average Los Angeles County consumption rates provided by the EMFAC2021 model for year 2028 (i.e., Project buildout year). Project-related fuel consumption was analyzed relative to the total Los Angeles County Fuel Consumption in 2023, as estimated by the CEC Annual Reporting**.**

Analysis of Project Impacts

Impact ENE-1: The Project would have a potentially significant impact on energy if it would result in wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.

Impact Analysis

Construction

Construction of the Project would result in energy demand primarily from off-road equipment and on-road vehicle fuel consumption (diesel and gasoline) and secondarily from electricity for conveying water used for dust suppression and for a temporary on-site construction office/trailer. The analysis below

[22] Musco Sports Lighting LLC. 2025. Inglewood High School Illumination Study.

[23] California Gas and Electric Utilities, 2024 California Gas Report, 2024, p. 165.

[24] LLG Consulting, Inc. 2025. Vehicle Miles Traveled Screening Assessment, September 2025. Provided in Appendix I of this Draft EIR

includes the Project's energy requirements and energy use efficiencies by energy type for each stage of the Project.

The estimated fuel usage for off-road equipment is based on the number and type of equipment that would be used during construction activities, hour usage estimates, the total duration of construction activities, and hourly equipment fuel consumption factors from the CARB OFFROAD model. The estimated fuel usage for on-road vehicles is based on the number of trucks and employee commute trips that would occur during construction activities and per mile fuel consumption factors from the CalEEMod integrated EMFAC2021 model. Electricity used for a portable construction office was calculated using energy intensity factors from CalEEMod and electricity from water conveyance for dust control was calculated using assumptions for gallons used per acre per day and CalEEMod water conveyance intensity factors applied to calculate total construction electricity consumption. Construction activities typically do not involve the consumption of natural gas. **Table 4.4-3** summarizes the Project's total and annual fuel and electricity consumption from construction activities.

TABLE 4.4-3
SUMMARY OF ENERGY CONSUMPTION DURING PROJECT CONSTRUCTION

Fuel Type	Quantity
Gasoline	**Gallons**
On-Road Construction (Workers)	114,943
Total Gasoline	**114,943**
Diesel	**gallons**
On-Road Construction Equipment	168,031
Off-Road Construction Equipment	154,660
Total Diesel	**322,691**
Electricity	**MWh**
Construction Trailer	80.64
Water Conveyance for Dust Control	80.68
Total Electricity	**161.32**
Annualized Gasoline Use (gal)	58,351
Annualized Diesel Use (gal)	163,814
Annualized Electricity (MWh)	81.90

Notes: gal = gallons; MWh = megawatt-hours.
Source: ESA 2025

As shown in **Table 4.4-3**, annual average construction electricity usage would be approximately 81.90 megawatt-hours (MWh). This amount is within the supply and infrastructure capabilities of Southern California Edison (SCE), the electricity provider for the Project Site, which had a total electricity sales of 81,841 gigawatt-hours (GWh) in 2024 (SCE 2025).[25] The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. Electricity use from construction would be short-term, limited to

[25] The most recent year that SCE data was available.

working hours, used for necessary construction-related activities, and represent a small fraction of the Project's annual operational electricity. Construction electricity usage of the Project would account for approximately 0.00010 percent of SCE's total sales and would not cause additional strain on SCE's electricity load. Therefore, impacts from construction electrical demand would be less than significant and would not result in the wasteful, inefficient, and unnecessary consumption of energy.

The energy use summary provided above in Table 4.4-3 represents the amount of energy that could potentially be consumed during Project construction based on a conservative set of assumptions, provided in **Appendix E** of this Draft EIR. As shown, on- and off-road vehicles would consume an estimated annual average of 58,351 gallons of gasoline and approximately 163,814 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.0019 percent of the 2023 annual on-road gasoline-related energy consumption and 0.037 percent of the 2023 annual diesel fuel-related energy consumption in California. Therefore, impacts from construction fuel demand would be less than significant and would not result in the wasteful, inefficient, and unnecessary consumption of energy.

Operation

The Project would consume energy from electricity for lighting and water conveyance, and natural gas for heating/cooling (see Chapter 3, Project Description, for additional details). During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and appliances for the new buildings, repaired buildings and sitewide improvements. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. **Table 4.4-4** summarizes the Project's operational energy consumption.[26]

The Project would increase demand for electricity including what is needed to support building operations. As shown in Table 4.4-4, the Project would result in an annual consumption of electricity of approximately MWh per year, which would represent approximately percent of SCE's total sales of 81,841 GWh in 2024 (SCE 2025). In addition, the CEC forecasts that SCE's peak demand in the Project buildout year of 2028, would be approximately 26,867 MW (CEC 2023). Under peak conditions, the Project would consume an increase of 2,294 MWh on an annual basis, which is equivalent to a peak of 0.26 to 0.52 MW (assuming 8,760 hours or 4,380 hours per year of active electricity demand). In comparison to the SCE power grid base peak load of 26,867 MW for 2028, the Project would represent approximately 0.0010 to 0.0019 percent of the SCE base peak load conditions. Thus, per CEQA Guidelines Appendix F, the impacts related to electrical supply and infrastructure capacity and the Project's effect on peak and base period demands would be less than significant.

[26] Project operational energy consumption in Table 4.4-4 does not include subtracting energy consumption associated with the existing classroom buildings to be demolished as part of the Project. Therefore, the Project's operational energy consumption would be lower than presented and the Project's operational energy consumption is conservatively considered as new.

TABLE 4.4-4
PROJECT OPERATIONAL ENERGY USAGE

Energy Type[a]	Annual Quantity[b,c]
Electricity	
Project:	
Building Energyd	2,199
Water Conveyance	95
Total Electricity	**2,294**
Natural Gas	
Project:	
Building Energy	5,086,113
Total Natural Gas	**5,086,113**
Transportation	
Project:	
Gasoline	93,309 gallons
Diesel	48,594 gallons
Natural Gas	12,446 gallons

Notes:

a. MWh = megawatt-hours; million cf = million cubic feet.
b. Detailed calculations are provided in Appendix D of this IS/MND.
c. Totals may not add up due to rounding of decimals.
d. This total includes the electricity usage for EV Charging on-site.

Source: ESA 2025

The Project would also be consistent with the Inglewood EECAP which promotes energy efficiency, reduced urban heat island effects, and sustainable building practices. The Project would include energy efficient design through CALGreen- and Title 24–compliant lighting and ventilation upgrades, brand new energy efficient systems, building repairs, 25 EV parking spaces (including 6 with charging stations), 40 bicycle parking spaces, and transit-accessible site design. Additionally, the Project would implement drought-tolerant landscaping, a smart water-efficient irrigation system, and recycled water use, aligning with EECAP measures for water conservation and tree planting. Therefore, with the incorporation of all of these Project features, the operation of the Project would not result in the wasteful, inefficient, and unnecessary consumption of electricity, and impacts would be less than significant.

The Project would increase the demand for natural gas resources. As shown in Table 4.4-4, the Project's estimated operational natural gas demand is million cubic feet, which represents percent of SoCalGas's projected supply of 2,177 million cubic feet per day in 2028 (California Gas and Electric Utilities 2024). As would be the case with electricity, the Project would comply with the applicable provisions of Title 24, City of Inglewood's EECAP, and the CALGreen Code in effect at the time of building occupancy to minimize natural gas demand. Therefore, with the incorporation of these features, operation of the Project would not result in the wasteful, inefficient, and unnecessary consumption of natural gas, and impacts would be less than significant.

The Project would increase the demand for transportation fuels, including gasoline and diesel consumption from mobile trips. The Project would result in the consumption of approximately 93,309 gallons of gasoline annually and 48,594 gallons of diesel annually. For comparison purposes, the transportation-related fuel usage for the Project would represent between 0.003 percent of the 2023 annual on-road gasoline- and 0.011 percent of the annual on-road diesel-related energy consumption in Los Angeles County (based on the available County fuel sales data), Therefore, the annual gasoline and diesel fuel consumption from operational vehicle use would not result in the wasteful, inefficient, and unnecessary consumption of transportation fuel, and impacts would be less than significant.

Based on the above, operation of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources, and impacts would be less than significant

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance after Mitigation

Impacts regarding wasteful, inefficient, or unnecessary consumption of energy resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Impact ENE-2: The Project would have a significant impact on energy if it would conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Impact Analysis

Construction

The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. With respect to truck fleet operators, USEPA and NHTSA have adopted fuel efficiency standards for medium- and heavy-duty trucks. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles and are phased in for model years 2014 through 2018 and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.[27] USEPA and NHTSA also adopted the Phase 2 heavy-duty truck standards, which would be phased in from model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.[28] The energy modeling for trucks does not take into account specific fuel reductions from these regulations, since they would apply to fleets as they incorporate newer trucks meeting the regulatory standards; however, these regulations would have an overall beneficial effect on reducing fuel consumption from trucks over time as older trucks are replaced with newer models that meet the standards.

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[27] USEPA, Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, August 2011.

[28] USEPA, Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, 2018.

In addition, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of five minutes at a location and the phase-in of off-road emission standards that result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy.

The Project would comply with all relevant federal and State regulations and energy conservation plans including USEPA and NHTSA fleet fuel efficiency standards and CARB's anti-idling regulations. Therefore, Project construction activities would not conflict with energy conservation plans and impacts would be less than significant.

Operation

The State and the City have implemented energy policies relevant to the Project. The California Renewables Portfolio Standard (RPS) was established in 2002 and required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2013. Senate Bill (SB) 100 is the most recent update to the State's RPS requirements. The RPS requires publicly owned utilities and retail sellers of electricity in California to procure 44 percent of their electricity sales from eligible renewable sources by 2024, 52 percent by the end of 2027, 60 percent by the end of 2030 and 100 percent by the end of 2045. The Project would comply with the applicable provisions of the applicable Title 24 standards and the CALGreen Code in effect at the time of building permit issuance, which would minimize energy demand.

The Project has been evaluated for consistency with local plans that include energy-related measures, including the Inglewood EECAP and the Inglewood General Plan Environmental Justice Element.

The City of Inglewood General Plan Environmental Justice Element presents several goals and policies that encourage energy efficiency and other measures that would reduce the energy consumption associated with development in the City. Several policies, including EJ-2.4, EJ-3.1, EJ-3.2, EJ-3.3, and EJ-3.4 promote active transportation, transit use, and the reduction of transportation-related fuel consumption. The Project would provide 32 bicycle parking spaces and 8 covered staff bicycle parking spaces and is located adjacent to the Los Angeles Metropolitan Transportation Authority (Metro) bus stops located along Manchester Boulevard, east and west of Grevillea Avenue, and along Eucalyptus Avenue at Kelso Street. Furthermore, The Project would provide pedestrian circulation improvements through upgraded sidewalks, barrier-free pathways, ADA-compliant entries, and improved lighting and landscaping that would improve walkability on-site and towards off-site transit stops. These features encourage non-vehicular modes of transportation and align with the City's goals of increasing active and sustainable travel. The Project would also be consistent with Policy EJ-2.8, which relates to the reduction of VMT to reduce emissions and transportation fuels. The Project would redevelop an existing school site, located within an already built environment and in close proximity to existing transit stops and downtown Inglewood amenities. These features would reduce reliance on single-occupancy vehicles and the associated fuel consumption. Therefore, the Project would be consistent with the Environmental Justice Element's goals.

The EECAP includes strategies to improve energy usage within the City, including measures aimed at increased energy efficiency and reduced urban heat island effect. More specifically, EECAP Measures 3.4 and 4.1 aim to encourage energy retrofits for existing buildings and the enhanced energy efficiency design in new development. Consistent with these strategies, the Project would install lighting and a ventilation system that conforms to the CALGreen Code and applicable Title 24 Standards. The Project would be replacing and upgrading buildings, which would integrate newer, more efficient lighting systems. In addition, the Project would include electric vehicle (EV) spaces and charging stations, bicycle parking spaces, and is located in an urban area with readily accessible transit locations. More specifically, the Project would include parking improvements and 25 EV parking spaces, including 6 stalls with charging stations, as well as 32 bicycle parking spaces and 8 covered staff bicycle parking spaces. The Project Site is located adjacent to a variety of existing transportation facilities. The Project Site is served by several bus stops. These features of the Project would promote energy efficiency and transportation-related fuel consumption and would remain consistent with the EECAP measures.

Additionally, the EECAP Measure 5.1 promotes water efficient design and Measure 6.1 promotes tree planting. The landscaping improvements included as part of the Project would consist of the installation of drought tolerant, low maintenance plants throughout the campus, and all existing irrigation would be removed and replaced with a water-efficient irrigation system with a smart weather-based controller. All landscaping would be designed to use recycled water for irrigation. These features would be consistent with water efficiency and urban heat effect strategies within the City's EECAP.

Additionally, the Project would redevelop an existing school site and would be subject to growth within the school enrollment capacity, and is therefore consistent with SCAG growth projections and would comply with State and local regulations to reduce energy consumption. The Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance after Mitigation

Not applicable. The Project would result in less than significant impacts regarding conflicts with or obstructing a state or local plan for renewable energy or energy efficiency.

Cumulative Impacts

Wasteful, Inefficient, and Unnecessary Use of Energy

Cumulative impacts occur when the incremental effects of a proposed project are significant when combined with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. As presented in Chapter 2, *Environmental Setting*, of this Draft EIR, Table 2-1, the District, as lead agency for the Project, has identified eleven related projects located within the vicinity of the Project Site. The eleven related projects are located within the City of Inglewood. The geographic context for the analysis of cumulative impacts on electricity is SCE's service area, and the geographic context for the analysis of cumulative impacts on natural gas is SoCalGas' service area, because the Project and related projects are located within the service boundaries of SCE and SoCalGas. While the

geographic context for transportation-related energy use is more difficult to define, the Project is considered in the context of County-wide consumption given the tendency for vehicles to travel within and through the local County for day-to-day travel and the availability of County-level data. Growth within these geographies is anticipated to increase the demand for electricity, natural gas, and transportation energy, as well as the need for energy infrastructure, such as new or expanded energy facilities.

Electricity

Buildout of the Project, related projects, and additional forecasted growth in SCE's service areas would cumulatively increase the demand for electricity supplies and the demand on infrastructure capacity. However, SCE, in coordination with the CEC, account for future increases in service area demand based on various economic, population, and efficiency factors. SCE relies on multiple forms of data from various agencies, including historical sales from the General Accountings Consumption and Earnings report, historical Los Angeles County employment data provided from the State's Economic Development Division, plug-in electric vehicle (PEV) projections from the CEC account, building permits when determining electricity Load Forecasts, solar rooftop installations from the Solar Energy Development Group, and electricity price projections from the Financial Services organization[29]

Thus, although Project development would result in the use of renewable and non-renewable electricity resources during construction and operation, which could affect future availability, the Project's use of such resources would be on a relatively small scale and would be reduced by measures rendering the Project more energy efficient. Related projects, as with the Project, would be required to evaluate energy impacts during construction and operation related to the wasteful, inefficient or unnecessary use of electricity, incorporate energy conservation features, comply with applicable regulations including the Title 24 standards and CALGreen Building Code, and incorporate mitigation measures, as necessary under CEQA. Related projects, as with the Project, would also be required to evaluate potential impacts related to local and regional supplies or capacity based on regional growth plans, such as SCAG's Connect SoCal, and SCE energy supply projections for long-term planning. Each of the related projects would be reviewed by the local utility provider to identify necessary electricity service connections to meet the needs of their respective projects. In addition, the local utility provider would provide service letters (which take into account all current uses and projected future development projects) for each related project confirming availability of adequate electricity supplies and infrastructure as part of the total load growth of the regional power system.

Additionally, as discussed above, SCE is required to procure 60 percent renewables by 2030 and 100 percent renewables by 2045 and is on track to hit their RPS targets. This represents the available off-site renewable sources of energy that could meet the Project's and related projects' energy demand. Therefore, the Project and related projects would comply with the energy conservation plans and efficiency standards required to ensure efficient energy use.

As such, the Project's impact, when considered together with related projects, would not be cumulatively considerable and would not result in cumulatively significant impacts related to wasteful, inefficient, or unnecessary use of electricity.

[29] CEC, The California Energy Demand 2024–2040 Revised Forecast, 2024.

Natural Gas

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and on infrastructure capacity. As stated above, based on the 2024 California Gas Report, the CEC estimates natural gas throughput within SoCalGas' planning area will be approximately 2,177 million cf in 2028 (Project buildout year).[30] The Project would result in an increase in natural gas consumption. SoCalGas forecasts consider projected population growth and development based on local and regional plans, and the Project's growth and development would not conflict with those projections. Additionally, as with the Project, each of the related projects would be reviewed by SoCalGas to identify necessary natural gas service connections to meet the needs of their respective projects, and SoCalGas would provide service letters for each related project confirming availability of adequate natural gas supplies as part of the total load growth of the regional natural gas system. Natural gas infrastructure is expanded and improved in response to increasing demand and it is expected that SoCalGas would continue to expand delivery capacity if necessary to meet growth requirements in the service area. Although Project development would result in the use of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, would be consistent with regional and local growth expectations for SoCalGas' service area, and would not result in the need to construct new or expand existing natural gas facilities or distribution lines.

Related projects, as with the Project, would be required to evaluate natural gas impacts during construction and operation related to the wasteful, inefficient or unnecessary use of natural gas, incorporate energy conservation features, comply with applicable regulations including the Title 24 standards and CALGreen Building Code, and incorporate mitigation measures, as necessary under CEQA. As with the Project, related projects would also be required to obtain evidence of service from SoCalGas, or the appropriate utility provider, to ensure that natural gas service would be available and provided to meet related project demands. Furthermore, the related projects are generally infill projects in a highly urbanized area already served by existing facilities and are generally residential, mixed-use, and commercial projects and not high-energy demand facilities, such as heavy industrial uses.

As such, the Project's contribution to cumulative impacts due to wasteful, inefficient and unnecessary use of natural gas would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

Transportation Energy

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. As described above, at buildout, the Project would consume a total of 93,309 gallons of gasoline and 48,594 gallons of diesel per year. For comparison purposes, the transportation-related fuel usage for the Project would represent between 0.003 percent of the 2023 annual on-road gasoline- and 0.011 percent of the annual on-road diesel-related energy consumption in Los Angeles County (based on the available County fuel sales data), as shown in Appendix E of this Draft EIR.

[30] California Gas and Electric Utilities, 2024 California Gas Report, 2024, p. 165.

Additionally, as described above, petroleum currently accounts for 72 percent of California's transportation energy sources;[31] however, over the last decade the State has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT, which would reduce reliance on petroleum fuels.

Construction of the Project and related projects would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB's Advanced Clean Car Program, the anti-idling regulation in accordance with Section 2485 in 13 CCR, and fuel requirements in accordance with 17 CCR Section 93115. The Project and related projects would benefit from fuel and automotive manufacturers' compliance with CAFE standards, which would result in more efficient use of transportation fuels (lower consumption). As such, the Project and related projects would indirectly comply with regulatory measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels.

The Project would be consistent with and not conflict with SCAG's land use type for the area and would encourage alternative transportation and a reduction in overall VMT. The Project would redevelop the existing Inglewood High School, which is located in close proximity to existing public transit stops, which would result in reduced VMT, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops. Therefore, operation of the Project would provide students and employees with transportation options that would limit VMT and transportation fuel consumption, and would not result wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels.

Connect SoCal is a regional planning tool that addresses cumulative growth and resulting environmental effects and is applicable to the Project and related projects with respect to transportation energy efficiency. Related projects would be required under CEQA to evaluate if their respective developments would conflict with the energy efficiency policies emphasized by Connect SoCal, such as the per capita VMT targets, promotion of alternative forms of transportation, proximity to public transportation options, and provisions for encouraging multi-modal and energy efficient transit, such as by accommodating bicycle parking and EV chargers at or above regulatory requirements. Furthermore, as with the Project, the related projects would similarly be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions that would not be in conflict with applicable provisions of SCAG's Connect SoCal for the land use type. For more information on the Project's consistency with SCAG's Connect SoCal, refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR.

Since the Project would not conflict with Connect SoCal, the Project's contribution to cumulative impacts due to wasteful, inefficient or unnecessary use of transportation fuel would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

[31] U.S. Energy Information Administration, California Energy Profile Overview, 2021, https://www.eia.gov/state/?sid=CA#tabs-1. Accessed July 11, 2022.

Conclusion

Based on the analysis provided above, the Project's contribution to cumulative impacts related to energy consumption (i.e., electricity, natural gas, and transportation energy) would not result in a cumulatively considerable effect related to potentially significant environmental impacts due to the wasteful, inefficient and unnecessary consumption of energy during construction or operation. As such, cumulative energy impacts under Threshold ENE-1 would be less than significant.

Consistency with State or Local Plan

Electricity

The Project would incorporate energy and water efficiency measures. Related projects, as with the Project, would be required to evaluate electricity conservation features, comply with applicable electricity efficiency plans and standards, including the Title 24 standards and CALGreen Building Code, and incorporate mitigation measures, as necessary under CEQA. Related projects, as with the Project, would also be required to evaluate potential impacts related to consistency with local and regional supplies or capacity based on regional growth plans, such as the SCE energy supply projections for long-term planning.

As such, the Project's contribution to cumulative impacts due to conflicting with or obstruction of a State or local plan for renewable energy or energy efficiency would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

Natural Gas

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity. However, as discussed above, SoCalGas forecasts take into account projected population growth and development based on local and regional plans, and the Project's development would not conflict with those projections.

Related projects, as with the Project, would be required to evaluate natural gas conservation features and compliance with applicable regulations, including the Title 24 standards and CALGreen Building Code, and incorporate mitigation measures, as necessary under CEQA. Related projects, as with the Project, would also be required to evaluate potential impacts related to consistency with local and regional supplies or capacity based on regional growth plans, such as the SoCalGas energy supply projections for long-term planning.

As such, the Project's contribution to cumulative impacts due to conflicting with or obstruction of a State or local plan for renewable energy or energy efficiency would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

Transportation Energy

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. However, as discussed above, the Project would not conflict with the energy efficiency policies emphasized by Connect SoCal. As discussed previously, the Project would be consistent with and not conflict with SCAG's land use type for

the area and would encourage alternative transportation at the existing Inglewood High School, which is located near a diverse mix of land uses and public transit options.

Connect SoCal is a regional planning tool that addresses cumulative growth and resulting environmental effects and is applicable to the Project, and related projects with respect to transportation energy efficiency. Related projects would be required under CEQA to evaluate if their respective developments would conflict with the energy efficiency policies emphasized by Connect SoCal, such as the per capita VMT targets, promotion of alternative forms of transportation, proximity to public transportation options, and provisions for encouraging multi-modal and energy efficient transit, such as by accommodating bicycle parking and EV chargers at or above regulatory requirements. Furthermore, related projects would be required to implement mitigation measures, as needed, if found to be in conflict with applicable provisions of Connect SoCal for the land use type.

Since the Project would not conflict with Connect SoCal, the Project's contribution to cumulative impacts related to potentially significant environmental impacts due to conflicting with or obstruction of a state or local plan for transportation energy efficiency would not be cumulatively considerable and, thus, would be less than significant.

Conclusion

Based on the analysis provided above, the Project's contribution to cumulative impacts related to conflicting with or obstruction of a state or local plan for renewable energy or energy efficiency would not be cumulatively considerable; therefore, cumulative energy impacts under Threshold ENE-2 would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance after Mitigation

Not applicable. Cumulative impacts during construction and operation of the Project would be less than significant.

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4.5 Geology and Soils – Paleontological Resources

4.5.1 Introduction

This section evaluates impacts on paleontological resources and unique geologic features based on the *Inglewood High School Reconstruction Project, Paleontological Resources Assessment Report* (Paleontological Resources Assessment Report) prepared by Environmental Science Associates (ESA) and dated June 2025, provided in Appendix F of this Draft EIR.

4.5.2 Environmental Setting

Regulatory Framework

Federal

There are no federal regulations applicable to this Project.

State

California Public Resources Code Section 5097.5

PRC Section 5097.5 provides protection for paleontological resources on public lands, where Section 5097.5(a) states, in part, that:

> *No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.*

Society for Vertebrate Paleontology Standard Guidelines

The Society of Vertebrate Paleontology (SVP) Guidelines (SVP, 2010) outline professional protocols and practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, specimen preparation, identification, analysis, and curation. Most practicing professional vertebrate paleontologists adhere closely to the SVP's assessment, mitigation, and monitoring requirements as specifically provided in its standard guidelines. Most state and local regulatory agencies accept and use the professional standards set forth by the SVP.

Paleontological Resources Significance Criteria

As defined by the SVP (2010:11), significant nonrenewable paleontological resources are:

Fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are considered to be older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years).

Multiple paleontological studies have additional criteria for the assessment of significance for fossil discoveries (e.g., Murphey et al., 2019; Murphey and Daitch, 2007; Scott and Springer, 2003). In general, these studies assess fossils as significant if one or more of the following criteria apply:

1. The fossils provide information on the evolutionary relationships and developmental trends among organisms, living or extinct.
2. The fossils provide data useful in determining the age(s) of the rock unit or sedimentary stratum, including data important in determining the depositional history of the region and the timing of geologic events therein.
3. The fossils provide data regarding the development of biological communities or interaction between paleobotanical and paleozoological biotas.
4. The fossils demonstrate unusual or spectacular circumstances in the history of life.
5. The fossils are in short supply and/or in danger of being depleted or destroyed by the elements, vandalism, or commercial exploitation, and are not found in other geographic locations.

In summary, significant paleontological resources are determined to be fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or diagnostically important (Murphey et al., 2019; Murphey and Daitch, 2007; Scott and Springer, 2003). Any identifiable vertebrate fossil is significant (SVP, 2010). Significant fossils can include remains of large to very small aquatic and terrestrial vertebrates or remains of plants and animals previously not represented in certain portions of the stratigraphy. Assemblages of fossils that might aid stratigraphic correlation, particularly those offering data for the interpretation of tectonic events, geomorphologic evolution, and paleoclimatology are also critically important (Scott and Springer, 2003; Scott et al., 2004).

Paleontological Potential

Paleontological potential is defined as the potential for a geologic unit to produce scientifically significant fossils. This is determined by rock type, the past history of the geologic unit in producing significant fossils, and the fossil localities recorded from that unit. Paleontological potential is derived from the known fossil data collected from the entire geologic unit and not just from one specific survey. In its "Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources," the SVP (2010) defines four categories of paleontological sensitivity (potential) for rock units: high, low, undetermined, and no potential.

- **High Potential.** Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered are considered to have a high potential for containing additional significant paleontological resources. Rocks units classified as having high potential for producing paleontological resources include, but are not limited to, sedimentary formations and some volcaniclastic formations (e. g., ashes or tephras), and some low-grade metamorphic rocks which contain significant paleontological resources anywhere within their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils (e. g., middle Holocene and older, fine-grained fluvial sandstones, argillaceous and carbonate-rich paleosols, cross-bedded point bar sandstones, fine-grained marine sandstones, etc.).

- **Low Potential.** Reports in the paleontological literature or field surveys by a qualified professional paleontologist may allow determination that some rock units have low potential for yielding significant fossils. Such rock units will be poorly represented by fossil specimens in institutional collections, or based on general scientific consensus only preserve fossils in rare circumstances and the presence of fossils is the exception not the rule, e. g. basalt flows or Recent colluvium. Rock units with low potential typically will not require impact mitigation measures to protect fossils.
- **Undetermined Potential.** Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment are considered to have undetermined potential. Further study is necessary to determine if these rock units have high or low potential to contain significant paleontological resources. A field survey by a qualified professional paleontologist to specifically determine the paleontological resource potential of these rock units is required before a paleontological resource impact mitigation program can be developed. In cases where no subsurface data are available, paleontological potential can sometimes be determined by strategically located excavations into subsurface stratigraphy.
- **No Potential.** Some rock units have no potential to contain significant paleontological resources, for instance high-grade metamorphic rocks (such as gneisses and schists) and plutonic igneous rocks (such as granites and diorites). Rock units with no potential require no protection nor impact mitigation measures relative to paleontological resources.

For geologic units with high potential, full-time monitoring is generally recommended during any project-related ground disturbance. For geologic units with low potential, monitoring will not generally be required. For geologic units with undetermined potential, field surveys by a qualified vertebrate paleontologist should be conducted to specifically determine the paleontological potential of the rock units present within the study area.

Regional

There are no regional regulations applicable to this Project.

Local

City of Inglewood General Plan

The City's General Plan does not contain any goals or policies for the preservation of paleontological resources.

Existing Conditions

Geologic Map and Literature Review

Review of the surficial geologic map of the Long Beach 30' X 60' Quadrangle indicates that the Project Site is underlain by old alluvial valley deposits (mapped as Qoa) consisting of "slightly to moderately consolidated, moderately dissected clay, silt and sand, and gravel along stream valleys and alluvial flats of larger rivers" (Bedrossian et al., 2012). These deposits date to the Late to Middle Pleistocene.

Alluvial sediments that date to the middle Holocene or older have a rich fossil history in southern California and particularly the Los Angeles Basin. The most common fossils include the bones of mammoth, bison, horse, wolf, camel, antelope, and giant ground sloth, as well as small animals such as

rodents, birds, and lizards (Graham and Lundelius, 1994; Jefferson, 1991a and b; Miller, 1971). In addition to illuminating the striking differences between Southern California in the Pleistocene and today, this abundant fossil record has been vital in studies of extinction (e.g., Sandom, et al., 2014; Barnosky et al., 2004), ecology (e.g., Connin et al., 1998), and climate change (e.g., Roy et al., 1996). Based on the reports received from the Natural History Museum of Los Angeles County (NHMLAC), similar significant vertebrate fossils were collected from less than two miles of the Project Site in Pleistocene alluvium.

Review of Geotechnical Report

ESA reviewed the geotechnical report for the Project prepared by Geolabs-Westlake Village (2024). The geotechnical report indicates that a total of nine 8-inch diameter hollow-stem auger borings (B1, B2, PT1-PT7) were excavated across the Project Site ranging in depth from 5 to 50 feet in depth. Six of these borings were utilized for on-site infiltration testing.

The geotechnical analysis found that the surface of the Project Site is composed of concrete, sidewalk, lawn, or asphalt beginning at the surface to approximately 1-1.5 feet bgs. Below the concrete, sidewalk, lawn, or asphalt, the Project Site is mostly capped with man-made undocumented artificial fill (associated with past grading, installation of utility lines, and an abandoned septic system) up to a maximum thickness of 3 feet. There is also a narrow strip of land along the northeastern-most boundary of the campus where the maximum fill depth is 8 feet, and it is related to the installation of the septic system. Older alluvium, herein referred to as the Lakewood Formation (Qlw), composed of clays, silts, and silty to gravelly sands were found beneath the fill materials. Plate 5 of the geotechnical report shows trench profiles with Qlw extending up to 10 feet bgs. The Lakewood Formation soils initially vary from mottled brown to very dark brown in the upper 3 to 4 feet to increasingly lighter colors at depths. At 4 feet bgs Lakewood Formation soils become brown to dark yellowish brown with gray brown mottling. Grain size also increases with depth and below 6 feet staining from orange oxide becomes common (Geolabs-Westlake Village, 2024).

The geotechnical report notes formations not recognized in the regional mapping of Dibblee and Minch (2007) or Bedrossian et al. (2012). Dibblee and Minch (2007) distinguish two marine Pleistocene formations below the older alluvium: the San Pedro Sand and the Inglewood Formation. Both of these formations are not exposed near the Project Site but crop out in the Windsor Hills to the north. The "Lakewood Formation" is used to denote non-marine Pleistocene deposits in the coastal region of the Los Angeles Basin (California Department of Water Resources, 1961). The name is primarily used in subsurface logs to denote a critical aquifer (e.g., Reicheard et al., 2003). ESA prefers to use the more general "Older Alluvium" to capture a fuller picture of the Pleistocene deposits, regardless of formal formation designation. This will allow alignment between the published maps and reports and the museum records searches.

Natural History Museum of Los Angeles County Records Search

In addition to the literature search, ESA requested a database search on December 24, 2024, from the NHMLAC for records of fossil localities in and around the Project Site. The purpose of the museum records search was to: (1) determine whether any previously recorded fossil localities occur in the Project Site, (2) assess the potential for disturbance of these localities during construction, and (3) evaluate the paleontological sensitivity within the Project Site and vicinity. The results from the NHMLAC were

received on December 30, 2024. The results indicate that no fossil localities fall within the Project Site, but that fossil localities do exist nearby from the same sedimentary deposits that occur in the Project Site, either at surface or at depth (**Table 4.5-1**). Fossil localities (including horse, camel, mammoth, bison, hares, weasels, peccary, antelope, birds, sloth, mastodon, saber-toothed cat, deer, and species in the Elephant clade) are situated within approximately 0.78 and 2.00 miles away from the Project Site. These localities were found at unknown depths and depths between 14 and 40 feet bgs.

TABLE 4.5-1
SUMMARY OF NHMLAC FOSSIL LOCALITIES

Locality Number	Formation	Taxa	Depth
LACM VP 3264	Unknown formation (Pleistocene sands)	Elephant clade (Proboscidea)	25 ft bgs
LACM VP 3252	Unknown formation (Pleistocene)	Bison (Bison), Camel (Camelops)	Unknown
LACM VP 7332	Unknown formation (Pleistocene; silty sand)	Mammoth (Mammuthus)	40 ft bgs
LACM VP 1180, 4942	Unknown formation (Pleistocene, massive sandy mudstone w scattered pieces of gravel)	Mammoth (Mammuthus); bison (Bison); hare (Lepus)	16 ft bgs
LACM VP 3789	Unknown (Pleistocene; pebbly gray-green to brown mud that directly overlies a gray-green fine sand)	Mammoth (Mammuthus)	14 ft bgs
LACM VP 1170	Unknown formation (Pleistocene)	Sloth (Megalonyx), camel (Camelops), weasel (Mustela frenata), bison (Bison), deer (Odocoileus), sabertooth cat (Smilodon), pronghorn antelope (Capromeryx), Mastodon (Mammut), peccary (Platygonus), horse (Equus), coot (Fulica), unidentified birds (Aves)	Unknown

Source: Bell, 2024

Paleontological Sensitivity Analysis

The literature and geologic mapping review and the records search results presented above were used to assign paleontological sensitivity to the geologic units at surface and underlying the Project Site, following the guidelines of the SVP (2010):

- **Qoa:** The late to middle Pleistocene alluvium that underlies the entire Project Site is of an age and sedimentary facies that has yielded abundant, diverse, and scientifically-significant fossils in the Los Angeles Basin. This determination is based on the published literature and museum records of the NHMLAC. Therefore, the Older Alluvium is assigned **High Potential** for significant paleontological resources.

4.5.3 Environmental Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a Project would have a significant impact related to geology and soils if it would:

- **Threshold GEO-1**: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issues 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 Publications 42.
  - Strong seismic ground shaking?
  - Seismic-related ground failure, including liquefaction?
  - Landslides?
- **Threshold GEO -2**: Result in substantial soil erosion or the loss of topsoil?
- **Threshold 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?
- **Threshold GEO-4**: 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?
- **Threshold GEO-5**: Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
- **Threshold GEO-6**: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The District determined in the Initial Study that the following environmental issue areas would result in less-than-significant impacts and, therefore, are scoped out of this Draft EIR. Please refer to **Appendix A-2** of this Draft EIR for a copy of the Initial Study and additional information regarding the following issue areas:

- **Threshold GEO-1**: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issues 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 Publications 42.
  - Strong seismic ground shaking?
  - Seismic-related ground failure, including liquefaction?
  - Landslides?
- **Threshold GEO -2**: Result in substantial soil erosion or the loss of topsoil?

- **Threshold 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?
- **Threshold GEO-4**: 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?
- **Threshold GEO-5**: Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

As detailed in the Initial Study, impacts related to geologic hazards, soil erosion, unstable soils, expansive soils, and soils inadequate of supporting septic tanks were determined to be no impact or less-than-significant and therefore are not addressed further in the EIR.

Methodology

The analysis of paleontological resources in this section of the Draft EIR is summarized from the Paleontological Resources Assessment Report prepared by a qualified ESA paleontologist.[1] The analysis included a geologic map and literature review, review of the geotechnical report prepared for the Project, a paleontological resources records search through the LACM, and a paleontological sensitivity analysis.

Paleontological sensitivity is the potential for a geologic unit to produce scientifically significant fossils that could yield information important to prehistory, or that embody the distinctive characteristics of a type of organism, environment, period of time, or geographic region. This is determined by rock type, past history of the geologic unit in producing significant fossils, and fossil localities recorded from that unit; for this reason, paleontological sensitivity depends on the known fossil data collected from the entire geologic unit, not just a specific survey. The SVP defines four categories of paleontological sensitivity or, per the SVP guidelines, potential, for the presence of paleontological resources – high, low, undetermined, and no potential, as further described in the Paleontological Resources Assessment Report. For geologic units with high potential, full-time monitoring is typically appropriate during any project-related ground disturbance because of the risk to paleontological resources. For geologic units with low potential, protection or salvage efforts are not generally required because of the low risk of encountering paleontological resources. For geologic units with undetermined potential, accepted professional practice typically includes field surveys conducted by a qualified vertebrate paleontologist to determine the paleontological potential of the rock units present in the study area, which in turn prescribes how mitigation measures should be assigned. For geologic units with no potential to produce scientifically significant fossils, no protection or salvage efforts are normally required.

Project Design Features

There are no Project Design Features associated with paleontological resources.

[1] ESA, *Inglewood High School Reconstruction Project, City of Inglewood, California, Paleontological Resources Assessment Report*, June, 2025.

Analysis of Project Impacts

Threshold GEO-6: The Project would result in a significant impact if it would directly or indirectly destroy a unique paleontological resource or site or unique geologic resource.

Impact Analysis

As discussed above in Section 4.5.1, Environmental Setting, Existing Conditions, geologic mapping indicates that the surface of the Project Site is entirely underlain by middle to late-Pleistocene age alluvium (Qoa), which has a high potential for paleontological resources. Moreover, numerous paleontological resources have been recovered from deposits of similar age near the Project Site. Specifically, fossils have been recovered from both 'Older Alluvium' and the 'Lakewood Formation.' Given the positive results of NHMLAC records search and the rich literature on fossils of a similar age in the Los Angeles Basin, it is likely that excavations for the Project below the artificial fill has the potential to encounter buried paleontological resources. Therefore, as the Project could directly or indirectly destroy unique paleontological resources, impacts on buried paleontological resources are considered potentially significant.

Mitigation Measures

The implementation of Mitigation Measures MM-GEO 1, MM-GEO- 2, MM-GEO- 3, and MM-GEO- 4 presented below address the potential for impacts in the event buried paleontological resources are encountered during excavation for the Project.

> **MM-GEO-1:** Prior to ground disturbing activities, the Applicant shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) standards for a Professional Paleontologist. The Qualified Paleontologist shall examine construction plans and prepare a Paleontological Resources Impact Mitigation Plan (Plan). This Plan shall include geological and paleontological contextual information, methods for paleontological construction monitoring, protocols for inadvertent discoveries, methods for sediment sampling and screening, including requirements for the radiocarbon dating of specimens or other materials, and final reporting requirements. The Qualified Paleontologist shall attend a pre-construction meeting to discuss the monitoring requirements with construction personnel and shall be responsible for overseeing paleontological monitors (meeting SVP standards) that will observe grading and excavation activities.
>
> **MM-GEO-2:** Paleontological monitoring shall be conducted during construction excavations into undisturbed older alluvial sediments (also noted as the Lakewood Formation) that exceed three feet in depth. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting and wet screening sediment samples of promising horizons for smaller fossil remains. If significant vertebrate fossils are found by screening, it will be necessary to collect a 6,000-pound sample for screening, per Society of Vertebrate Paleontology Guidelines (SVP, 2010). The sample can be collected by construction machinery and stockpiled and processed in a safe location on site, or transported to another site for processing. The frequency of monitoring inspections shall be determined by the Qualified Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Paleontologist.

MM-GEO- 3: If a potential fossil is found, the Qualified Paleontologist shall have authority to temporarily stop excavation activity or 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 by the Qualified Paleontologist 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 Qualified Paleontologist'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 preservation in place is not feasible, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location.

MM-GEO-4: Any fossils recovered during Project-related excavations shall be prepared to the point of identification. The residue form sediment samples shall be dried and sorted with a binocular dissecting microscope. Both macrofossils and vertebrate microfossils shall be prepared to the point of identification, identified, and curated into an accredited repository. The Qualified Paleontologist shall prepare a final report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall accompany the specimens to the accredited repository. The report shall also be submitted by the Applicant to the Inglewood Unified School District to signify the satisfactory completion of the Project and required mitigation measures.

Level of Significance after Mitigation

Implementation of Mitigation Measures MM-GEO-1 through MM-GEO-4 would require retention of a Qualified Paleontologist meeting the SVP Standards in order to provide technical and compliance oversight, construction worker paleontological resources sensitivity training, and paleontological resources monitoring. Impacts related to paleontological resources during Project construction would be reduced to less than significant with implementation of the above mitigation measures. The Project would have no impacts to paleontological resources during operation as there would be no continuous groundbreaking and excavation activities during Project operation.

Cumulative Impacts

As previously discussed, the region is known to have paleontological resources, and like the Project, other related projects in the vicinity that involve excavation into native soils have the potential to encounter paleontological resources due to prior discoveries in the area and the generally high sensitivity of underlying soils. Accordingly, cumulative impacts prior to mitigation would be significant. Similar to the Project, related projects would be required to implement monitoring and preservation measures or conditions of approval.

Mitigation Measures

The Project would be required to implement Mitigation Measures MM-GEO-1 through MM-GEO-4, and related projects that involve excavation into native soils are expected to implement similar mitigation measures or conditions of approval.

Level of Significance After Mitigation

Cumulative impacts related to paleontological resources under the Project would be potentially significant prior to implementation of mitigation measures. With implementation of Mitigation Measures

MM-GEO-1 through MM-GEO-4, Project impacts would be reduced to a less than significant level, and implementation of similar mitigation measures or conditions of approval by related projects would similarly reduce impacts to a less than significant level. Paleontological resources, if encountered during excavation, would be protected and recovered and would contribute to the body of scientific knowledge of paleontological resources. The Project's contribution to cumulative impacts would not be cumulatively considerable and, therefore, cumulative impacts would be less than significant.

4.6 Greenhouse Gas Emissions

4.6.1 Introduction

This section compares the Project's characteristics with applicable regulations, plans, and policies set forth by the State of California, South Coast Air Quality Management District (SCAQMD), the Southern California Association of Governments (SCAG), and the City of Inglewood to reduce greenhouse gas (GHG) emissions to determine whether the Project is consistent with and/or would conflict with the provisions of these plans. To assist in analyzing the Project's potential to conflict with applicable regulations, plans and policies, this section also estimates the Project's GHG emissions generated by Project construction and operations, taking into account mandatory and voluntary energy and resource conservation measures that have been incorporated into the Project to reduce GHG emissions. Details regarding the GHG analysis are provided in Appendix C of this Draft EIR.

4.6.2 Environmental Setting

Regulatory Framework

Federal

Federal Clean Air Act

The United States Environmental Protection Agency (USEPA) is responsible for implementing federal policy to address GHG emissions. The United States Supreme Court (Supreme Court) ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that carbon dioxide (CO_2) and other GHGs are pollutants under the Federal Clean Air Act (CAA), which the USEPA must regulate if it determines they pose an endangerment to public health or welfare. In December 2009, USEPA issued an endangerment finding for GHGs under the CAA, concluding that GHG emissions endanger public health and welfare and serving as the legal and scientific foundation for federal standards on GHG emissions from power plants, vehicles, and industry. In June 2025, the USEPA proposed to rescind this finding and roll back all GHG emission standards for light-duty, medium-duty, and heavy-duty vehicles and engines established under CAA Section 202(a) since 2010. This proposal, if finalized, would eliminate the USEPA's primary basis for regulating climate pollution.

The Federal Government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States. These programs focus on energy efficiency, renewable energy, CH_4 and other non-CO_2 gases, agricultural practices, and implementation of technologies to achieve GHG reductions. USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the ENERGY STAR labeling system for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

Corporate Average Fuel Economy Standards

In response to the *Massachusetts v. Environmental Protection Agency* ruling, President George W. Bush issued Executive Order 13432 in 2007, directing the USEPA, the U.S. Department of Transportation (USDOT), and the U.S. Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines. The National Highway Traffic Safety Administration (NHTSA) has subsequently issued multiple final rules regulating fuel efficiency for, and

GHG emissions from, cars and light-duty trucks for model years 2011, 2012–2016, 2017–2021, and 2027–2032.

In June 2024, the NHTSA announced the Final Rule for CAFE Standards for Model Years 2027 – 2031 and Heavy-Duty Pickup Trucks and Vans (HDPUV) Fuel Efficiency Standards for Model Years 2030 – 2035. The final rule establishes standards that would require an industry-wide fleet average of approximately 50.4 mpg in MY 2031 for passenger cars and light trucks, and an industry fleet-wide average for HDPUVs of roughly 2.851 gallons per 100 miles in MY 2035.[1] The final CAFE standards increase at a rate of 2 percent per year for passenger cars in MYs 2027 - 2031 and 2 percent per year for light trucks in model years 2029 – 2031.[2] The final HDPUV fuel efficiency standards increase at a rate of 10 percent per year in MYs 2030 - 2032 and 8 percent per year in MYs 2033 – 2035.[3]

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the USEPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018, tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines. Building on the first phase of standards, in August 2016, the USEPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons.[4]

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the USEPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

[1] National Highway Traffic Safety Administration (NHTSA), 2024. Corporate Average Fuel Economy. https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy#75896. Accessed February 2025.

[2] Ibid

[3] Ibid

[4] USEPA, EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August 2016.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[5]

State

California Air Resources Board

The California Air Resources Board (CARB), a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and State air pollution control programs within California. In this capacity, CARB conducts research, sets the California Ambient Air Quality Standards, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's State Implementation Plan (SIP), for which it works closely with the federal government and the local air districts. The SIP is required for the State to take over implementation of the Federal CAA. CARB also has primary responsibility for adopting regulations to meet the State's goal of reducing GHG emissions. The State has met its goals to reduce GHG emissions to 1990 levels by 2020. Subsequent State goals include reducing GHG emissions to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050.

California Greenhouse Gas Reduction Targets

Executive Order S-3-05

Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following GHG emission reduction targets:

- By 2010, California shall reduce GHG emissions to 2000 levels;
- By 2020, California shall reduce GHG emissions to 1990 levels; and
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

Executive Order B-30-15

On April 29, 2015, Governor Brown issued Executive Order B-30-15. Therein, the Governor directed the following:

- Established a new interim statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030.
- Ordered all State agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets.
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons (MMT) of CO_2e.

[5] A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

Executive Order B-55-18

Executive Order B-55-18, issued by Governor Brown in September 2018, establishes a new statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB would work with relevant State agencies to develop a framework for implementation and accounting that tracks progress towards this goal as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

California Global Warming Solutions Act of 2006 and 2016

In 2006, the California State Legislature adopted Assembly Bill (AB) 32 (codified in the California Health and Safety Code (HSC), Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197, and both were signed by Governor Brown. SB 32 and AB 197 amend HSC Division 25.5, establish a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and include provisions to ensure that the benefits of State climate policies reach disadvantaged communities. The goals outlined in SB 32 update the Climate Change Scoping Plan requirement of AB 32 and involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. AB 197, signed September 8, 2016, is a bill linked to SB 32 and prioritizes efforts to cut GHG emissions in low-income or minority communities. AB 197 requires CARB to make available, and update at least annually, on its website the emissions of GHGs, criteria pollutants, and toxic air contaminants for each facility that reports to CARB and air districts.

Climate Change Scoping Plan

AB 32 required CARB to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (HSC Section 38561(h)). The 2008 Climate Change Scoping Plan proposed a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health."[6] The 2008 Climate Change Scoping Plan had a range of GHG reduction actions which included direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms, such as a Cap-and-Trade Program, and an AB 32 implementation fee to fund the program.

2008 Climate Change Scoping Plan

The 2008 Climate Change Scoping Plan proposed a "coordinated set of solutions" to address major GHG emission sources. Transportation emissions were tackled through stricter fuel economy standards, the LCFS, and land use planning to reduce trip length and generation. Energy efficiency was promoted for buildings, land use, and industrial operations, while utility providers were required to increase renewable energy use through the Renewable Portfolio Standard (RPS) (see discussion below in *Energy-Related Sources*).[7] As mandated by HSC Division 25.5, CARB approved the 1990 GHG inventory, setting the

[6] CARB, Climate Change Scoping Plan, December 2008.

[7] For a discussion of Renewables Portfolio Standard, refer to subsection *California Renewables Portfolio Standard*.

2020 reduction target at 427 $MMTCO_2e$ based on the Intergovernmental Panel on Climate Change (IPCC) Second Assessment Report (SAR) GWP values. To determine necessary reductions under AB 32, CARB estimated a BAU scenario of 596 $MMTCO_2e$ by 2020, assuming no new GHG measures, natural gas for all electricity generation, no vehicle fuel efficiency improvements, and 2005 building codes. This required a 28.4% reduction to achieve the 1990 target.

2014 Climate Change Scoping Plan Update

The First Update to the Climate Change Scoping Plan (2014 Scoping Plan), approved in May 2014, expanded upon the initial plan with new strategies and recommendations.[8] CARB revised the 1990 GHG inventory and 2020 target using IPCC AR4 GWP values, raising the 2020 limit to 431 $MMTCO_2e$. Adjustments to the State's 2020 BAU emissions estimate reflected impacts of the 2007–2009 recession, updated fuel and energy demand forecasts, and recently adopted regulations. The updated BAU estimate of 509.4 $MMTCO_2e$ required a 15.4% reduction (78.4 $MMTCO_2e$) to meet the 2020 target, down from the earlier 28.4%. CARB identified six key focus areas for achieving long-term reduction goals by 2050: energy, transportation, agriculture, water, waste management, and natural/working lands, with specific recommended actions for each.[9] Technologies critical to these goals included energy efficiency, large-scale electrification, decarbonization of electricity and fuels, and widespread adoption of clean energy technologies. The update emphasized zero-net-energy buildings and CARB's collaboration with CPUC and CEC to enhance building efficiency.[10]

2017 Climate Change Scoping Plan Update

In response to SB 32, CARB adopted the 2017 Climate Change Scoping Plan Update to ensure California meets its 2030 GHG reduction target. Building on previous plans, it introduced strategies that promote innovation, economic growth, and public health improvements. Key policies include lower GHG fuels, efficiency regulations, and the extended Cap-and-Trade program, addressing emissions from major stationary and mobile sources.[11] The 2017 Scoping Plan considers 2020 policies, programs, and reductions from natural and working lands.[12] Major reductions would come from the Cap-and-Trade program, electricity standards requiring 50% renewable energy by 2030, improved energy efficiency, LCFS updates, short-lived GHG strategies like HFC reduction, and mobile source and freight strategies. The Plan discusses local governments' role in meeting GHG goals through land use authority, renewable energy incentives, efficiency measures, and CEQA-related climate action.

2022 Climate Change Scoping Plan for Achieving Carbon Neutrality

CARB published the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) in November 2022, as the third update to the initial 2008 Climate Change Scoping. The 2022 Scoping Plan Update is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 The 2030 target is an interim but important

[8] CARB, First Update to the AB 32 Scoping Plan, May 2014.
[9] CARB, 2014 Scoping Plan, May 2014, p. 6.
[10] CARB, 2014 Scoping Plan, May 2014, p. 32.
[11] CARB, 2017 Scoping Plan, November 2017, p. 6
[12] CARB, 2017 Scoping Plan, November 2017.

stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan Update incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan Update also includes discussion for the first time of the natural and working lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires. A summary of the GHG emissions reductions and targets set forth under the 2022 Scoping Plan Update is provided in **Table 4.6-1**.

TABLE 4.6-1
ESTIMATED STATEWIDE GREENHOUSE GAS EMISSIONS REDUCTIONS IN THE 2022 SCOPING PLAN

Emissions Scenario	GHG Emissions ($MMTCO_2e$)
2019	
2019 State GHG Emissions	404
2030	
2030 BAU Forecast	312
2030 GHG Emissions without Carbon Removal and Capture	233
2030 GHG Emissions with Carbon Removal and Capture	226
2030 Emissions Target Set by AB 32 (i.e., 1990 level by 2030)	260
Reduction below Business-As-Usual necessary to achieve 1990 levels by 2030	52 (16.7%)[a]
2045	
2045 BAU Forecast	266
2045 GHG Emissions without Carbon Removal and Capture	72
2045 GHG Emissions with Carbon Removal and Capture	(3)

Notes: MMTCO2e = million metric tons of carbon dioxide equivalents; parenthetical numbers represent negative values.
a. 312 – 260 = 52 /312 = 16.7%.
Source: CARB, Final 2022 Scoping Plan for Achieving Carbon Neutrality, November 2022

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor's Executive Orders and State Statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan. **Table 4.6-2** provides a summary of major climate legislation and executive orders issued since the adoption of the 2017 Scoping Plan.

TABLE 4.6-2
MAJOR CLIMATE LEGISLATION AND EXECUTIVE ORDERS ENACTED SINCE THE 2017 SCOPING PLAN

Bill/Executive Order	Summary
Assembly Bill 1279 (AB 1279) (Muratsuchi, Chapter 337, Statutes of 2022) *The California Climate Crisis Act*	AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage (CCUS) technologies. This bill is reflected directly in 2022 Scoping Plan Update.
Senate Bill 905 (SB 905) (Caballero, Chapter 359, Statutes of 2022) *Carbon Capture, Removal, Utilization, and Storage Program*	SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CCUS and carbon dioxide removal (CDR) projects and technology. The bill requires CARB, on or before January 1, 2025, to adopt regulations creating a unified state permitting application for approval of CCUS and CDR projects. The bill also requires the Secretary of the Natural Resources Agency to publish a framework for governing agreements for two or more tracts of land overlying the same geologic storage reservoir for the purposes of a carbon sequestration project. The 2022 Scoping Plan Update modeling reflects both CCUS and CDR contributions to achieve carbon neutrality.
Senate Bill 846 (SB 846) (Dodd, Chapter 239, Statutes of 2022) *Diablo Canyon Powerplant: Extension of Operations*	SB 846 extends the Diablo Canyon Power Plant's sunset date by up to five additional years for each of its two units and seeks to make the nuclear power plant eligible for federal loans. The bill requires that the CPUC not include and disallow a load-serving entity from including in their adopted resource plan, the energy, capacity, or any attribute from the Diablo Canyon power plant. The 2022 Scoping Plan Update explains the emissions impact of this legislation.
Senate Bill (SB 1020) (Laird, Chapter 361, Statutes of 2022) *Clean Energy, Jobs, and Affordability Act of 2022*	SB 1020 adds interim renewable energy and zero carbon energy retail sales of electricity targets to California end-use customers set at 90 percent in 2035 and 95 percent in 2040. It accelerates the timeline required to have 100 percent renewable energy and zero carbon energy procured to serve state agencies from the original target year of 2045 to 2035. This bill requires each state agency to individually achieve the 100 percent goal by 2035 with specified requirements. This bill requires the CPUC, CEC, and CARB, on or before December 1, 2023, and annually thereafter, to issue a joint reliability progress report that reviews system and local reliability. The bill also modifies the requirement for CARB to hold a portion of its Scoping Plan workshops in regions of the state with the most significant exposure to air pollutants by further specifying that this includes communities with minority populations or low-income communities in areas designated as being in extreme federal non-attainment. The 2022 Scoping Plan Update describes the implications of this legislation on emissions.
Senate Bill 1137 (SB 1137) (Gonzales, Chapter 365, Statutes of 2022) *Oil & Gas Operations: Location Restrictions: Notice of Intention: Health protection zone: Sensitive receptors*	SB 1137 prohibits the development of new oil and gas wells or infrastructure in health protection zones, as defined, except for purposes of public health and safety or other limited exceptions. The bill requires operators of existing oil and gas wells or infrastructure within health protection zones to undertake specified monitoring, public notice, and nuisance requirements. The bill requires CARB to consult and concur with the California Geologic Energy Management Division (CalGEM) on leak detection and repair plans for these facilities, adopt regulations as necessary to implement emission detection system standards, and collaborate with CalGEM on public access to emissions detection data.

Bill/Executive Order	Summary
Senate Bill 1075 (SB 1075) (Skinner, Chapter 363, Statutes of 2022) *Hydrogen: Green Hydrogen: Emissions of Greenhouse Gases*	SB 1075 requires CARB, by June 1, 2024, to prepare an evaluation that includes: policy recommendations regarding the use of hydrogen, and specifically the use of green hydrogen, in California; a description of strategies supporting hydrogen infrastructure, including identifying policies that promote the reduction of GHGs and short-lived climate pollutants; a description of other forms of hydrogen to achieve emission reductions; an analysis of curtailed electricity; an estimate of GHG and emission reductions that could be achieved through deployment of green hydrogen through a variety of scenarios; an analysis of the potential for opportunities to integrate hydrogen production and applications with drinking water supply treatment needs; policy recommendations for regulatory and permitting processes associated with transmitting and distributing hydrogen from production sites to end uses; an analysis of the life-cycle GHG emissions from various forms of hydrogen production; and an analysis of air pollution and other environmental impacts from hydrogen distribution and end uses. This bill would inform the production of hydrogen at the scale called for in the 2022 Scoping Plan Update.
Assembly Bill 1757 (AB 1757) (Garcia, Chapter 341, Statutes of 2022) *California Global Warming Solutions Act of 2006: Climate Goal: Natural and Working Lands*	AB 1757 requires the California Natural Resources Agency (CNRA), in collaboration with CARB, other state agencies, and an expert advisory committee, to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions in 2030, 2038, and 2045 by January 1, 2024. These targets must support state goals to achieve carbon neutrality and foster climate adaptation and resilience. This bill also requires CARB to develop standard methods for state agencies to consistently track GHG emissions and reductions, carbon sequestration, and additional benefits from natural and working lands over time. These methods will account for GHG emissions reductions of CO_2, methane, and nitrous oxide related to natural and working lands and the potential impacts of climate change on the ability to reduce GHG emissions and sequester carbon from natural and working lands, where feasible. This 2022 Scoping Plan Update describes the next steps and implications of this legislation for the natural and working lands sector.
Senate Bill 1206 (SB 1206) (Skinner, Chapter 884, Statutes of 2022) *Hydrofluorocarbon gases: sale or distribution*	SB 1206 mandates a stepped sales prohibition on newly produced high- global warming potential (GWP) hydrofluorocarbons (HFCs) to transition California's economy toward recycled and reclaimed HFCs for servicing existing HFC-based equipment. Additionally, SB 1206 also requires CARB to develop regulations to increase the adoption of very low-, i.e., GWP < 10, and no-GWP technologies in sectors that currently rely on higher-GWP HFCs.
Senate Bill 27 (SB 27) (Skinner, Chapter 237, Statutes of 2021) *Carbon Sequestration: State Goals: Natural and Working Lands: Registry of Projects*	SB 27 requires CNRA, in coordination with other state agencies, to establish the Natural and Working Lands Climate Smart Strategy by July 1, 2023. This bill also requires CARB to establish specified CO_2 removal targets for 2030 and beyond as part of its Scoping Plan. Under SB 27, CNRA is to establish and maintain a registry to identify projects in the state that drive climate action on natural and working lands and are seeking funding. CNRA also must track carbon removal and GHG emission reduction benefits derived from projects funded through the registry. This bill is reflected directly in 2022 Scoping Plan Update as CO_2 removal targets for 2030 and 2045 in support of carbon neutrality.
Senate Bill 596 (SB 596) (Becker, Chapter 246, Statutes of 2021) *Greenhouse Gases: Cement Sector: Net-Zero Emissions Strategy*	SB 596 requires CARB, by July 1, 2023, to develop a comprehensive strategy for the state's cement sector to achieve net-zero emissions of GHGs associated with cement used within the state as soon as possible, but no later than December 31, 2045. The bill establishes an interim target of 40 percent below the 2019 average GHG intensity of cement by December 31, 2035. Under SB 596, CARB must: Define a metric for GHG intensity and establish a baseline from which to measure GHG intensity reductions. • Evaluate the feasibility of the 2035 interim target (40 percent reduction in GHG intensity) by July 1, 2028. • Coordinate and consult with other state agencies. • Prioritize actions that leverage state and federal incentives. • Evaluate measures to support market demand and financial incentives to encourage the production and use of cement with low GHG intensity. The 2022 Scoping Plan Update modeling is designed to achieve these outcomes.

Bill/Executive Order	Summary
Executive Order N-82-20	Governor Newsom signed Executive Order N-82-20 in October 2020 to combat the climate and biodiversity crises by setting a statewide goal to conserve at least 30 percent of California's land and coastal waters by 2030. The Executive Order also instructed the CNRA, in consultation with other state agencies, to develop a Natural and Working Lands Climate Smart Strategy that serves as a framework to advance the state's carbon neutrality goal and build climate resilience. In addition to setting a statewide conservation goal, the Executive Order directed CARB to update the target for natural and working lands in support of carbon neutrality as part of this Scoping Plan, and to take into consideration the NWL Climate Smart Strategy. CO_2 Executive Order N-82-20 also calls on the CNRA, in consultation with other state agencies, to establish the California Biodiversity Collaborative (Collaborative). The Collaborative shall be made up of governmental partners, California Native American tribes, experts, business and community leaders, and other stakeholders from across the state. State agencies will consult the Collaborative on efforts to: • Establish a baseline assessment of California's biodiversity that builds upon existing data and can be updated over time. • Analyze and project the impact of climate change and other stressors in California's biodiversity. • Inventory current biodiversity efforts across all sectors and highlight opportunities for additional action to preserve and enhance biodiversity. CNRA also is tasked with advancing efforts to conserve biodiversity through various actions, such as streamlining the state's process to approve and facilitate projects related to environmental restoration and land management. The California Department of Food and Agriculture (CDFA) is directed to advance efforts to conserve biodiversity through measures such as reinvigorating populations of pollinator insects, which restore biodiversity and improve agricultural production. The Natural and Working Lands Climate Smart Strategy informs 2022 Scoping Plan Update.
Executive Order N-79-20	Governor Newsom signed Executive Order N-79-20 in September 2020 to establish targets for the transportation sector to support the state in its goal to achieve carbon neutrality by 2045. The targets established in this Executive Order are: • 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. • 100 percent of medium- and heavy-duty vehicles will be zero-emission by 2045 for all operations where feasible, and by 2035 for drayage trucks. • 100 percent of off-road vehicles and equipment will be zero-emission by 2035 where feasible. The Executive Order also tasked CARB to develop and propose regulations that require increasing volumes of zero- electric passenger vehicles, medium- and heavy-duty vehicles, drayage trucks, and off-road vehicles toward their corresponding targets of 100 percent zero-emission by 2035 or 2045, as listed above. The 2022 Scoping Plan Update modeling reflects achieving these targets.
Executive Order N-19-19	Governor Newsom signed Executive Order N-19-19 in September 2019 to direct state government to redouble its efforts to reduce GHG emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy. This Executive Order instructs the Department of Finance to create a Climate Investment Framework that: • Includes a proactive strategy for the state's pension funds that reflects the increased risks to the economy and physical environment due to climate change. • Provides a timeline and criteria to shift investments to companies and industry sectors with greater growth potential based on their focus of reducing carbon emissions and adapting to the impacts of climate change. • Aligns with the fiduciary responsibilities of the California Public Employees' Retirement System, California State Teachers' Retirement System, and the University of California Retirement Program. Executive Order N-19-19 directs the State Transportation Agency to leverage more than $5 billion in annual state transportation spending to help reverse the trend of increased fuel consumption and reduce GHG emissions associated with the transportation sector. It also calls on the Department of General Services to leverage its management and ownership of the state's 19 million square feet in managed buildings, 51,000 vehicles, and

Bill/Executive Order	Summary
	other physical assets and goods to minimize state government's carbon footprint. Finally, it tasks CARB with accelerating progress toward California's goal of five million ZEV sales by 2030 by: • Developing new criteria for clean vehicle incentive programs to encourage manufacturers to produce clean, affordable cars. • Proposing new strategies to increase demand in the primary and secondary markets for ZEVs. • Considering strengthening existing regulations or adopting new ones to achieve the necessary GHG reductions from within the transportation sector. The 2022 Scoping Plan Update modeling reflects efforts to accelerate ZEV deployment.
Senate Bill 576 (SB 576) (Umberg, Chapter 374, Statutes of 2019) *Coastal Resources: Climate Ready Program and Coastal Climate Change Adaptation, Infrastructure and Readiness Program*	Sea level rise, combined with storm-driven waves, poses a direct risk to the state's coastal resources, including public and private real property and infrastructure. Rising marine waters threaten sensitive coastal areas, habitats, the survival of threatened and endangered species, beaches, other recreation areas, and urban waterfronts. SB 576 mandates that the Ocean Protection Council develop and implement a coastal climate adaptation, infrastructure, and readiness program to improve the climate change resiliency of California's coastal communities, infrastructure, and habitat. This bill also instructs the State Coastal Conservancy to administer the Climate Ready Program, which addresses the impacts and potential impacts of climate change on resources within the conservancy's jurisdiction.
Assembly Bill 65 (AB 65) (Petrie-Norris, Chapter 347, Statutes of 2019) *Coastal Protection: Climate Adaption: Project Prioritization: Natural Infrastructure: Local General Plans*	This bill requires the State Coastal Conservancy, when it allocates any funding appropriated pursuant to the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018, to prioritize projects that use natural infrastructure in coastal communities to help adapt to climate change. The bill requires the conservancy to provide information to the Office of Planning and Research on any projects funded pursuant to the above provision to be considered for inclusion into the clearinghouse for climate adaption information. The bill authorizes the conservancy to provide technical assistance to coastal communities to better assist them with their projects that use natural infrastructure.
Executive Order B-55-18	Governor Brown signed Executive Order B-55-18 in September 2018 to establish a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. Policies and programs undertaken to achieve this goal shall: • Seek to improve air quality and support the health and economic resiliency of urban and rural communities, particularly low-income and disadvantaged communities. • Be implemented in a manner that supports climate adaptation and biodiversity, including protection of the state's water supply, water quality, and native plants and animals. This Executive Order also calls for CARB to: • Develop a framework for implementation and accounting that tracks progress toward this goal. • Ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The 2022 Scoping Plan Update is designed to achieve carbon neutrality no later than 2045 and the modeling includes technology and fuel transitions to achieve that outcome.
Senate Bill 100 (SB 100) (De León, Chapter 312, Statutes of 2018) *California Renewables Portfolio Standard Program: emissions of greenhouse gases*	Under SB 100, the CPUC, CEC, and CARB shall use programs under existing laws to achieve 100 percent clean electricity. The statute requires these agencies to issue a joint policy report on SB 100 every four years. The first of these reports was issued in 2021. The 2022 Scoping Plan Update reflects the SB 100 Core Scenario resource mix with a few minor updates.

Bill/Executive Order	Summary
Assembly Bill 2127 (AB 2127) (Ting, Chapter 365, Statutes of 2018) *Electric Vehicle Charging Infrastructure: Assessment*	This bill requires the CEC, working with CARB and the CPUC, to prepare and biennially update a statewide assessment of the electric vehicle charging infrastructure needed to support the levels of electric vehicle adoption required for the state to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030 and of reducing emissions of GHGs to 40 percent below 1990 levels by 2030. The bill requires the CEC to regularly seek data and input from stakeholders relating to electric vehicle charging infrastructure. This bill supports the deployment of ZEVs as modeled in 2022 Scoping Plan Update.
Senate Bill 30 (SB 30) (Lara, Chapter 614, Statutes of 2018) *Insurance: Climate Change*	This bill requires the Insurance Commissioner to convene a working group to identify, assess, and recommend risk transfer market mechanisms that, among other things, promote investment in natural infrastructure to reduce the risks of climate change related to catastrophic events, create incentives for investment in natural infrastructure to reduce risks to communities, and provide mitigation incentives for private investment in natural lands to lessen exposure and reduce climate risks to public safety, property, utilities, and infrastructure. The bill requires the policies recommended to address specified questions.
Assembly Bill 2061 (AB 2061) (Frazier, Chapter 580, Statutes of 2018) *Near-Zero-Emission and Zero-Emission Vehicles*	Existing state and federal law sets specified limits on the total gross weight imposed on the highway by a vehicle with any group of two or more consecutive axles. Under existing federal law, the maximum gross vehicle weight of that vehicle may not exceed 82,000 pounds. AB 2061 authorizes a near-zero- emission vehicle or a zero-emission vehicle to exceed the weight limits on the power unit by up to 2,000 pounds. This bill supports the deployment of cleaner trucks as modeled in this 2022 Scoping Plan Update.

The 2022 Scoping Plan Update identifies the need to accelerate AB32's 2030 target, from 40 percent to 48 percent below 1990 levels. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet these GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Scoping Plan Update approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology. The Scoping Plan Scenario is summarized in Table 2-1 starting on page 72 of the Scoping Plan. It includes references to relevant statutes and Executive Orders, although it is not comprehensive of all existing new authorities for directing or supporting the actions described. Table 2-1 identifies actions related to a variety of sectors such as: smart growth and reductions in Vehicle Miles Traveled (VMT); light-duty vehicles (LDV) and zero-emission vehicles (ZEV); truck ZEVs; reduce fossil energy, emissions, and GHGs for aviation ocean-going vessels, port operations, freight and passenger rail, oil and gas extraction; and petroleum refining; improvements in electricity generation; electrical appliances in new and existing residential and commercial buildings; electrification and emission reductions across industries such as the for food products, construction equipment, chemicals and allied products, pulp and paper, stone/clay/glass/cement, other industrial manufacturing, and agriculture; retiring of combined heat and power facilities; low carbon fuels for transportation, business, and industry; improvements in non-combustion methane emissions, and introduction of low GWP refrigerants.

Achieving the targets described in the 2022 Scoping Plan Update will require continued commitment to and successful implementation of existing policies and programs, and identification of new policy tools and technical solutions to go further, faster. California's Legislature and state agencies will continue to collaborate to achieve the state's climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities,

academic institutions, and the private sector to achieve the state's near-term and longer-term emission reduction goals and a more equitable future for all Californians. The Scoping Plan acknowledges that the path forward is not dependent on one agency, one state, or even one country. However, the State can lead by engaging Californians and demonstrating how actions at the state, regional, and local levels of governments, as well as action at community and individual levels, can contribute to addressing the challenge.

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA)." Appendix D is intended to provide clarification on challenges local jurisdictions face when implementing GHG reduction strategies or approving much-needed housing projects.[13]

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan Update is critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan Update discusses the role of local governments in meeting the State's GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed statewide building code requirements and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment—the two largest GHG emissions sectors over which local governments have authority. The City has taken the initiative in combating climate change by addressing it in the City's Energy Efficiency Climate Action Plan.

Cap-and-Trade Program

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as one of the strategies California would employ to reduce GHG emissions. CARB asserts that this program will help put California on the path to meet its goal of ultimately achieving an 80 percent reduction from 1990 levels by 2050. Under the Cap-and-Trade Program, an overall limit on GHG emissions from capped sectors is established and facilities subject to the cap will be able to trade permits to emit GHGs.

CARB designed and adopted a California Cap-and-Trade Program[14] pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from public and private major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve the State's emission-reduction mandates. The statewide cap for GHG emissions from the capped sectors[15] (e.g., electricity generation, petroleum refining, and cement

[13] CARB, Final 2022 Climate Change Scoping Plan – Appendix D: Local Actions, November 2022.

[14] California Code of Regulations (CCR) 17, Section 95800 to 96023.

[15] CCR 17, Section 95811, 95812.

production) commenced in 2013 and will decline over time, achieving GHG emissions reductions throughout the Program's duration.

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities that emit more than 25,000 $MTCO_2e$ per year must comply with the Cap-and-Trade Program.[16] Triggering of the 25,000 $MTCO_2e$ per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule).[17]

Each covered entity with a compliance obligation is required to surrender "compliance instruments"[18] for each $MTCO_2e$ of GHG they emit. Covered entities are allocated free allowances in whole or part (if eligible), and can buy allowances at auction, purchase allowances from others, or purchase offset credits.

The Cap-and-Trade Regulation provides a firm cap, ensuring that the statewide emission limits will not be exceeded. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported.[19] Accordingly, for projects that are subject to the CEQA, GHG emissions from electricity consumption are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.[20]

The Program applies to emissions that cover approximately 80 percent of the State's GHG emissions. Demonstrating the efficacy of AB 32 policies, California achieved its 2020 GHG Reduction Target four years earlier than mandated. The largest reductions were the result of increased renewable electricity in the electricity sector, which is a covered sector in the Cap-and-Trade Program.

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

Energy-Related Sources

Emission Performance Standards

SB 1368, signed September 29, 2006, is a companion bill to AB 32, which requires the CPUC and the CEC to establish GHG emission performance standards for the generation of electricity. These standards

[16] CCR 17, Section 95812.

[17] CCR 17, Section 95100-95158.

[18] Compliance instruments are permits to emit, the majority of which will be "allowances," but entities also are allowed to use CARB-approved offset credits to meet up to 8% of their compliance obligations.

[19] CCR 17, Section 95811(b).

[20] CCR 17, Section 95811, 95812(d).

also generally apply to power that is generated outside of California and imported into the State. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB to meet its mandate under AB 32.

Renewables Portfolio Standard

SB 1078 (Chapter 516, Statutes of 2002) required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017 as an RPS. Subsequent amendments provided additional targets throughout the years. Most recently, on October 7, 2015, SB 350 (Chapter 547, Statues of 2015), also known as the Clean Energy and Pollution Reduction Act, further increased the RPS to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027. SB 350 also requires the State to double statewide energy efficiency savings in electricity and natural gas end uses by 2030. On September 10, 2018, SB 100, provided additional RPS targets of 44 percent by 2024, 52 percent by 2027, and 60 percent by 2030, and that CARB should plan for 100 percent eligible renewable energy resources and zero-carbon resources by 2045.[21]

Assembly Bill 1279 (The California Climate Crisis Act)

The Legislature enacted AB 1279,[22] The California Climate Crisis Act, on September 16, 2022. AB 1279 establishes the policy of the State to achieve net zero GHG emissions, carbon neutrality,[23] as soon as possible, but no later than 2045 and achieve and maintain net negative GHG emissions thereafter. Additionally, AB 1279 ensures that by 2045 Statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. SB 1279 also requires CARB to ensure that the 2022 Scoping Plan Update identifies and recommends measures to achieve carbon neutrality, and to identify and implement policies and strategies for carbon dioxide removal solutions and carbon capture, utilization, and storage technologies. It also requires CARB to submit an annual report on progress in achieving the 2022 Scoping Plan's goals.

Mobile Sources

California Low-Carbon Fuel Standard

Executive Order S-01-07 was enacted on January 18, 2007. The order mandates the following: (1) that a Statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020 and (2) that a LCFS for transportation fuels be established in California. The 2022 Scoping Plan identified the LCFS as a regulatory measure to reduce GHG emission to meet the 2030 emissions target. In September 2018, the standards were amended by CARB to require a 20 percent reduction in carbon intensity by 2030, aligning with California's 2030 targets set by SB 32.[24]

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[21] California Legislative Information, SB-100 California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases.

[22] California Legislative Information, 2022. AB-1279 The California Climate Crisis Act. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB1279. Accessed January 2023.

[23] *Carbon neutrality* means "net zero" emissions of GHGs. In other words, it means that GHG emissions generated by sources such as transportation, power plants, and industrial processes must be less than or equal to the amount of carbon dioxide that is stored, both in natural sinks and through mechanical sequestration. AB 1279 uses the terminology net zero and the 2022 Scoping Plan Update uses the terminology carbon neutrality or carbon neutral. These terms mean the same thing and are used interchangeably.

[24] CARB, CARB amends Low-Carbon Fuel Standard for wider impact, 2018, https://ww2.arb.ca.gov/index.php/news/carb-amends-low-carbon-fuel-standard-wider-impact. Accessed April 2025.

Advanced Clean Car Regulations

In 2012, CARB approved the Advanced Clean Cars (ACC) program, an emissions-control program for model years 2015–2025.[25] The components of the ACC program include the low-emissions vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the ZEV regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in-hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.[26]

On September 23, 2020, Governor Gavin Newsom signed Executive Order No. N-79-20, which would phase out sales of new gas-powered passenger cars by 2035 in California with an additional 10-year transition period for heavy vehicles. The State would not restrict used car sales, nor forbid residents from owning gas-powered vehicles. In accordance with the Executive Order, CARB developed the *Mobile Source Strategy*, a comprehensive analysis that presents scenarios for possible strategies to reduce the carbon, toxic and unhealthy pollution from cars, trucks, equipment, and ships. The strategies will provide important information for numerous regulations and incentive programs going forward by conveying what is necessary to address the aggressive emission reduction requirements.

The primary mechanism for achieving the ZEV target for passenger cars and light trucks is CARB's ACC II Program, which updates the prior ACC Program. The ACC II regulations focuses on post-2025 model year light-duty vehicles, as requirements are already in place for new vehicles through the 2025 model year. A rulemaking package was presented to the Board in June 2022 and was adopted on November 30, 2022. On December 18, 2024, the USEPA granted the waiver to CARB, enabling the implementation and enforcement of the Advanced Clean Cars II Regulations which target model years 2026 through 2035 for light- and medium-duty vehicles and revises the California Low Emission Vehicle (LEV) and ZEV standards. CARB anticipates reductions in pollutants such as fine PM2.5, NO_X, hydrocarbons (HC), GHG, and toxic air contaminants.

Advanced Clean Trucks Program

The Advanced Clean Trucks regulations were approved on June 25, 2020, and require that manufacturers sell zero-emissions or near-zero-emissions trucks as an increasing percentage of their annual California sales beginning in 2024. The goal of this proposed strategy is to achieve nitrogen oxide (NOx) and GHG emission reductions through advanced clean technology, and to increase the penetration of the first wave of zero-emissions heavy-duty technology into applications that are well suited to its use. According to CARB, "Promoting the development and use of advanced clean trucks will help CARB achieve its emission reduction strategies as outlined in the SIP, Sustainable Freight Action Plan, SB 350, and AB 32".[27] The percentage of zero-emissions truck sales is required to increase every year until 2035 when sales would need to be 55 percent of Classes 2b–3 (light/medium- and medium-duty trucks) truck sales,

[25] CARB, Advanced Clean Cars Program – About, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about. Accessed April 2025.

[26] CARB, Advanced Clean Cars Program – About, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about. Accessed April 2025.

[27] CARB, Advanced Clean Trucks Program. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks/about. Accessed April 2025.

75 percent of Classes 4–8 (medium- to heavy-duty trucks) straight truck sales, and 40 percent of truck tractor (heavy-duty trucks weighing 33,001 pounds or greater) sales.

Sustainable Communities and Climate Protection Act (SB 375)

The Sustainable Communities and Climate Protection Act of 2008, or SB 375 (Chapter 728, Statutes of 2008), establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions, was adopted by the State on September 30, 2008. SB 375 finds that the "transportation sector is the single largest contributor of GHGs of any sector."[28] Under SB 375, CARB is required, in consultation with the metropolitan planning organizations (MPOs), to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. SCAG is the MPO in which the City of Inglewood is located. In March 2018, the CARB updated the SB 375 targets for the SCAG region to require an eight percent reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions.[29] As discussed further below, SCAG has adopted an updated Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) subsequent to the update of the emission targets. The 2024–2050 RTP/SCS, referred to as Connect SoCal 2024, is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.[30]

Senate Bill 743

Former Governor Brown signed SB 743 in 2013, which creates a process to change the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 requires the Governor's Office of Land Use and Climate Innovation (LCI) (formerly Office of Planning and Research) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) methodology for evaluating transportation impacts. Particularly within areas served by transit, the required alternative criteria must "promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses." Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

Building Standards and Other Regulations

California Appliance Efficiency Regulations

The Appliance Efficiency Regulations (Title 20, Sections 1601 through 1608), adopted by the CEC, include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

Title 24, Building Standards Code and California Green Building Standards Code

The CEC first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations [CCR] Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The

[28] State of California, SB No. 375, September 30, 2008.

[29] CARB, SB 375 Regional Greenhouse Gas Emissions Reduction Targets.

[30] SCAG, Connect SoCal, Chapter 0: Making Connections, May 7, 2020, p. 5.

standards are updated periodically to allow for the consideration and inclusion of new energy-efficiency technologies and methods.

On August 11, 2021, the CEC adopted the 2022 Title 24 Standards, which were approved by the California Building Standards Commission for inclusion into the California Building Standards Code in December 2021. The 2022 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 standards.[31]

In September 2024, the CEC approved the 2025 California Building Energy Efficiency Standards, which would go into effect on January 1, 2026. The 2025 standards build on the 2022 standards by aiming to decarbonize buildings by encouraging energy efficiency, solar and battery storage, and shifting times of energy use. by expanding heat pump requirements for space and water heating in more building types, including low-rise multifamily units. It also introduces stronger electric-ready mandates to ease future transitions to electric appliances. Updates to solar and battery storage standards now align with revised net billing policies for high-rise multifamily and nonresidential buildings. Additionally, nonresidential buildings face new space conditioning controls, while multifamily buildings must meet stricter ventilation requirements for better indoor air quality. These updates enhance energy efficiency, reduce emissions, and save Californians an estimated $4.8 billion in energy costs over 30 years.[32]

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11) are commonly referred to as the CALGreen Building Code and was developed to help the State achieve its GHG reduction goals under HSC Division 25.5 (e.g., AB 32) by codifying standards for reducing building-related energy, water, and resource demand, which in turn reduces GHG emissions from energy, water, and resource demand. The purpose of the CALGreen Building Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality."[33] The CALGreen Building Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission. The CALGreen Building Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality.[34]

[31] California Energy Commission, 2022 Building Energy Efficiency Standards.

[32] California Energy Commission (CEC), 2025 California Energy Code Fact Sheet. https://www.energy.ca.gov/sites/default/files/2024-09/2025_California_Energy_Code_Fact_Sheet_ada.pdf. Accessed January 2025.

[33] California Building Standards Commission, 2010 California Green Building Standards Code, 2010.

[34] California Building Standards Commission, 2010 California Green Building Standards Code, 2010.

Regional

South Coast Air Quality Management District

The Project Site is located in the SCAQMD South Coast Air Basin (Air Basin), which consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside Counties, in addition to the San Gorgonio Pass area in Riverside County. SCAQMD is responsible for air quality planning in the Air Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects). The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any GHG significance threshold for other jurisdictions.

Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

On April 4, 2024, the SCAG's Regional Council formally adopted 2024-2050 RTP/SCS, also known as Connect SoCal 2024,[35] which is an update to the previous Connect SoCal 2020. Using growth forecasts and economic trends, Connect SoCal 2024 provides a vision for transportation throughout the region for the next several decades by considering the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future and identifying regional transportation strategies to address mobility needs. Connect SoCal 2024 describe how the region can attain the GHG emission-reduction targets set by CARB by achieving reductions in per-capita transportation GHG emissions of 8 percent by 2020 and 19 percent by 2035, compared to the 2005 level.[36] Compliance with and implementation of Connect SoCal 2024 policies and strategies would have the co-benefit of reducing per capita criteria air pollutant emissions (e.g., nitrogen dioxide, carbon monoxide, etc.) associated with reduced per capita VMT.

Connect SoCal 2024 states that the SCAG region was home to approximately 19 million people in 2019 and included approximately 6.2 million homes and approximately 9 million jobs.[37] By 2050, the integrated growth forecast projects that these figures will increase by 2 million people, with approximately 1.6 million more homes and 1.3 million more jobs.[38] Connect SoCal 2024 will add 181,200 new miles of transit service, 4,000 new miles of bike lanes and 869 new miles to the Regional

[35] Southern California Association of Governments (SCAG), 2024. Connect SoCal, The Southern California Association of Governments' 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy Final Program Environmental Report, Certified April 4, 2024.

[36] Ibid

[37] Ibid

[38] Ibid

Express Lane Network.[39] Priority Development Areas (PDAs), which are defined in Connect SoCal 2024 as areas where people have access to multiple modes of transportation or where trip origins and destinations are closer together allowing for shorter trips, will accommodate approximately 66 percent of new households and 54 percent of new jobs between 2019 and 2050.[40] PDAs include Neighborhood Mobility Areas (NMAs), Transit Priority Areas (TPAs), and Livable Corridors, and Spheres of Influence (SOIs) (unincorporated areas only).

NMAs include intersection density, low-speed streets, land use diversity, and accessibility to amenities within one-mile using street network distances to improve, restore and enhance safe and convenient connections to schools, hospitals, shopping, services, places of worship, parks, greenways, and other destinations. TPA's are areas within one half mile of existing or planned major transit stops. 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. SOIs are existing or planned service areas within the planning boundary outside of an agency's legal boundary in unincorporated areas to promote the efficient, effective, and equitable delivery of local and regional services for existing and future residents and to encourage a collaborative process between agencies.

Connect SoCal 2024's overall land use pattern reinforces the trend of focusing new housing and employment in the region's PDAs. PDAs are a development pattern that demonstrates how the region can sustainably accommodate needed housing by supporting transportation and land use strategies that achieve California's GHG emission reduction goals. Connect SoCal 2024 strives to increase housing production, improve equity and resilience, preserve natural lands, improve public health, increase transportation safety, support the goods movement industries, and use resources more efficiently.

Connect SoCal 2024 provides specific strategies for implementation. These strategies include implementing the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, taking transit); encouraging residential development in areas surrounding existing and planned transit/rail stations; promoting growth in PDAs with a focus on future housing and population growth in areas with existing and planned urban infrastructure including transit and active transportation to reduce single occupancy vehicles; encouraging housing in areas with access to community infrastructure and that are close to transit and walkable; and promoting 15-minute communities (areas where residents can access there day-today needs within a 15-minute walk, bike ride or roll from their home.[41]

In addition, Connect SoCal 2024 includes strategies to promote active transportation, support local planning and projects that serve short trips, promote transportation investments, investments in active transportation, prioritize climate mitigation, adaption, resilience and economic benefits of natural and working lands, and prioritize the most vulnerable populations and communities subject to climate hazards, promote sustainable water use planning, practices and storage, promote sustainable development, and reduce air pollutants and GHG emissions to improve air quality. CARB has accepted SCAG's GHG

[39] Ibid
[40] Ibid
[41] Ibid

emissions quantification determinations as presented in Connect SoCal 2024 for future GHG emission reduction targets.[42]

Connect SoCal 2024's GHG emissions reduction target is more dependent on policies and programs than on capital projects, but it is projected to meet the 2035 target of 19 percent below 2005 levels.[43] SCAG achieved the 8 percent GHG emissions reduction from 2005 levels by 2020; however, the decreased travel during the COVID-19 shutdown most likely helped achievement of the 2020 target.[44]

Local

City of Inglewood General Plan

The City General Plan Environmental Justice Element contains policies and goals related to General Environmental Health, Access, and Connectivity. The following goals and measures would be relevant to the Project.

Section 2: Land Use and Environment

Policy EJ-2.4: Create land use patterns and public amenities that encourage people to walk, bicycle and use public transit.

Policy EJ-2.8: Encourage new development to reduce vehicle miles traveled to reduce pollutant emissions.

Policy EJ-2.10: Implement and periodically update the City's Energy and Climate Action Plan to improve air quality and reduce greenhouse gas emissions.

Policy EJ-2.27: Enforce the state's 5-minute maximum idling limitation for sleeper diesel trucks and trucks with a gross vehicle weight rating over 10,000 pounds.

Section 3: Mobility and Active Living

Policy 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.

Policy EJ-3.2: Facilitate pedestrian and bicycle access to parks and open space through infrastructure investments and improvements.

Policy EJ-3: Partner with the Inglewood Unified School District and non-profit organizations to improve access to bicycles, helmets, and related equipment for lower income families.

Policy EJ-3.4: Require the provision of on-site bicycle facilities in new large-scale development projects.

[42] Ibid

[43] Ibid

[44] Ibid

City of Inglewood Energy Efficiency Climate Action Plan

The City adopted the Energy Efficiency Climate Action Plan (EECAP) in 2015 as an update to the 2013 EECAP. Within the EECAP, strategies and measures are identified to tackle Citywide energy usage and GHG emissions. The following goals and measures would be relevant to the Project.

Goal 3: Increase Energy Efficiency in Existing Commercial Units.

Measure 3.4: Promote or require commercial energy retrofits.

Goal 4: Increase Energy Efficiency in New Commercial Development.

Measure 4.1: Encourage or require EE standards exceeding Title 24.

Goal 5: increase Energy Efficiency through Water Efficiency.

Measure 5.1: Promote or require WE through SBX7-7.

Goal 6: Decrease Energy Demand through Reducing Urban Heat Island Effect.

Measure 6.1: Promote Tree Planting for Shade and EE.

Measure 6.2: Incentivize or require light-reflecting surfaces.

Greenhouse Gas Background

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

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHGs keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, as GHG from human activities increase, they build up in the atmosphere and warm the climate, leading to many other changes around the world - in the atmosphere, on land, and in the oceans, with associated adverse climatic and ecological consequences.[45]

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHGs, primarily from the burning of fossil fuels (from motor vehicle travel, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.), deforestation, agricultural activity, and the decomposition of solid waste. Scientists refer to the global

[45] United States Environmental Protection Agency (USEPA), Climate Change Indicators: Greenhouse Gases, https://www.epa.gov/climate-indicators/view-indicators. Accessed February 2025.

warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect.[46]

Global GHG emissions due to human activities have grown since pre-industrial times. As reported by the USEPA, global carbon emissions from fossil fuels increased by over 16 times between 1900 and 2008 and by about 43 percent between 1990 and 2015. In addition, in the Global Carbon Budget 2022 report, published in November 2022, atmospheric CO_2 concentrations in 2022 were found to be more than 50 percent above the concentration at the start of the Industrial Revolution, and the present concentration is the highest during at least the last 800,000 years.[47] Global increases in CO_2 concentrations are due primarily to fossil fuel use, with land use change providing another significant but smaller contribution. Regarding emissions of non-CO_2 GHGs, these have also increased significantly since 1990.[48] In particular, studies have concluded that it is very likely that the observed increase in methane (CH_4) concentration is predominantly due to agriculture and fossil fuel use.[49]

In August 2007, international climate talks held under the auspices of the United Nations Framework Convention on Climate Change led to the official recognition by the participating nations that global emissions of GHG must be reduced. According to the "Ad Hoc Working Group on Further Commitments of Annex I Parties under the Kyoto Protocol," avoiding the most catastrophic events forecast by the United Nations IPCC would entail emissions reductions by industrialized countries in the range of 25 to 40 percent below 1990 levels. Because of the Kyoto Protocol's Clean Development Mechanism, which gives industrialized countries credit for financing emission-reducing projects in developing countries, such an emissions goal in industrialized countries could ultimately spur efforts to cut emissions in developing countries as well.[50]

Regarding the adverse effects of global warming, as reported by SCAG:

> *Global warming poses a serious threat to the economic well-being, public health and natural environment in southern California and beyond. The potential adverse impacts of global warming include, among others, a reduction in the quantity and quality of water supply, a rise in sea level, damage to marine and other ecosystems, and an increase in the incidences of infectious diseases. Over the past few decades, energy intensity of the national and state economy has been declining due to the shift to a more service-oriented economy. California ranked fifth lowest among the states in CO_2 emissions from fossil fuel consumption per unit of Gross State Product. However, in terms of total CO_2 emissions, California is second only to Texas in the nation and is the 12th largest source of climate change emissions in the world, exceeding most nations. The SCAG region, with close to half of the state's population and economic activities, is also a major contributor to the global warming problem.*[51]

[46] Pew Center on Global Climate Change, Climate Change 101: Understanding and Responding to Global Climate Change.

[47] P. Friedlingstein et al.: Global Carbon Budget *2020*, 2020.

[48] USEPA, Global Greenhouse Gas Emissions Data, www.epa.gov/ghgemissions/global-greenhouse-gas-emissions-data. Accessed February 2025.

[49] USEPA, Climate Change Indicators: Atmospheric Concentrations of Greenhouse Gas, updated April 2021.

[50] United Nations Framework Convention on Climate Change, Press Release—Vienna UN Conference Shows Consensus on Key Building Blocks for Effective International Response to Climate Change, August 31, 2007.

[51] Southern California Associated of Governments (SCAG), The State of the Region—Measuring Regional Progress, December 2006, p. 121.

Greenhouse Gas Fundamentals

GHGs are those compounds in the Earth's atmosphere that play a critical role in determining temperature near the Earth's surface. GHGs include CO_2, CH_4, nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3).[52] More specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere, but retain some of the low frequency infrared energy, which is radiated back from the Earth towards space, resulting in a warming of the atmosphere. Compounds that are regulated as GHGs are discussed in **Table 4.6-3**, *Description of Identified GHGs*.[53,54]

TABLE 4.6-3
DESCRIPTION OF IDENTIFIED GHGS

GHG	General Description
Carbon Dioxide (CO_2)	An odorless, colorless GHG, which has both natural and anthropocentric sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human-caused) sources of CO_2 are burning coal, oil, natural gas, and wood.
Methane (CH_4)	A flammable gas and the main component of natural gas. When one molecule of CH_4 is burned in the presence of oxygen, one molecule of CO_2 and two molecules of water are released. A natural source of CH_4 is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH_4, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N_2O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are non-toxic, non-flammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987. HFCs are synthetic man-made chemicals that are used as a substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone, but to a much lesser extent than CFCs.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conductor manufacturing.
Sulfur Hexafluoride (SF_6)	An inorganic, odorless, colorless, non-toxic, and non-flammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF_3)	An inorganic, non-toxic, odorless, non-flammable gas. NF_3 is used in the manufacture of semi-conductors, as an oxidizer of high energy fuels, for the preparation of tetrafluorohydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

Notes: GHGs identified in this table are ones identified in the Kyoto Protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.

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

[52] As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.

[53] Intergovernmental Panel on Climate Change (IPCC), Second Assessment Report, Working Group I: The Science of Climate Change, 1995.

[54] IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.

Not all GHGs possess the same ability to induce climate change. CO_2 is the most abundant GHG in Earth's atmosphere. Other GHGs are less abundant but have higher global warming potential (GWP) than CO_2. Thus, emissions of other GHGs are commonly quantified in the units of equivalent mass of CO_2 (CO_2e). GWP is based on several factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO_2, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years otherwise referred to as atmospheric lifetime) relative to that of CO_2.

The larger the GWP, the more that a given gas warms the Earth compared to CO_2 over that time.[55] These GWP ratios are available from IPCC. Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's SAR. The IPCC updated the GWP values in its AR4. The GWPs in the IPCC AR4 are used by CARB for reporting statewide GHG emissions inventories, consistent with international reporting standards. By applying the GWP ratios, Project-related CO_2e emissions can be tabulated in metric tons per year. Typically, the GWP ratio corresponding to the warming potential of CO_2 over a 100-year period is used as a baseline.

The IPCC has issued an updated Fifth Assessment Report (AR5), which has reduced down the majority of the GWP for key regulated pollutants. As CARB still uses AR4 values and the modeling software California Emissions Estimator Model (CalEEMod) is built on these assumptions, AR4 GWP values are used for the Project. Generally, the changes from AR4 to AR5 are reductions in warming potential for the GHG most associated with construction and operation of typical development projects. The GWP from AR4 and AR5 and atmospheric lifetimes for key regulated GHGs are provided in **Table 4.6-4**.

TABLE 4.6-4
ATMOSPHERIC LIFETIMES AND GWPS

Gas	Atmospheric Lifetime (Years)	GWP (100-Year Time Horizon) (AR4 Assessment)	GWP (100-Year Time Horizon) (AR5 Assessment)
Carbon Dioxide (CO_2)	50-200	1	1
Methane (CH_4)	12 (+/-3)	25	28
Nitrous Oxide (N_2O)	114	298	265
HFC-23: Fluoroform (CHF_3)	270	14,800	12,400
HFC-134a: 1,1,1,2-Tetrafluoroethane (CH_2FCF_3)	14	1,430	1,300
HFC-152a: 1,1-Difluoroethane ($C_2H_4F_2$)	1.4	124	138
PFC-14: Tetrafluoromethane (CF_4)	50,000	7,390	6,630
PFC-116: Hexafluoroethane (C_2F_6)	10,000	12,200	11,100
Sulfur Hexafluoride (SF_6)	3,200	22,800	23,500
Nitrogen Trifluoride (NF_3)	740	17,200	16,100

Sources: IPCC, Climate Change 2007: Working Group I: The Physical Science Basis, Direct Global Warming Potentials

[55] GWPs and associated CO_2e values were developed by IPCC and published in its Second Assessment Report (SAR) in 1996. Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's SAR. The IPCC updated the GWP values based on the latest science in its Fourth Assessment Report (AR4). CARB has begun reporting GHG emission inventories for California using the GWP values from the IPCC AR4.

Projected Impacts of Global Warming in California

In 2009, California adopted a statewide Climate Adaptation Strategy (CAS) that summarizes climate change impacts and recommends adaptation strategies across seven sectors: Public Health, Biodiversity and Habitat, Oceans and Coastal Resources, Water, Agriculture, Forestry, and Transportation and Energy. The CNRA updated the CAS in 2018 in a strategy called *Safeguarding California* and again in 2021. The 2021 CAS's goal is to drive collective action moving forward through six main priorities: Strengthen Protections for Climate Vulnerable Communities, Bolster Public Health and Safety to Protect Against Increasing Climate Risks, Building a Climate Resilient Economy, Accelerate Nature-Based Climate Solutions and Strengthen Climate Resilience of Natural Systems, Make Decisions Based on the Best Available Climate Science, Partner and Collaborate to Leverage Resources.[56]

The 2024 Draft California CAS was released in May 2024 and builds on the approach of the 2021 CAS. Specifically, the 2024 Draft CAS outlines the state's key climate resilience priorities, includes specific and measurable actions, and serves as a framework for collective efforts across sectors and regions in California.

The Natural Resources Agency has also produced climate change assessments which detail impacts of global warming in California.[57] These include:

- Sea level rise, coastal flooding and erosion of California's coastlines would increase, as well as sea water intrusion.
- The Sierra snowpack would decline between 70 and 90 percent, threatening California's water supply.
- Higher risk of forest fires resulting from increasing temperatures and making forests and brush drier. Climate change will affect tree survival and growth.
- Attainment of air quality standards would be impeded by increasing emissions, accelerating chemical processes, and raising inversion temperatures during stagnation episodes resulting in public health impacts.
- Habitat destruction and loss of ecosystems due to climate change affecting plant and wildlife habitats.
- Global warming can cause drought, warmer temperatures and saltwater contamination resulting in impacts to California's agricultural industry.

With regard to public health, as reported by the Center for Health and the Global Environment at the Harvard Medical School, the following are examples of how climate change can affect cardio-respiratory disease: (1) pollen is increased by higher levels of atmospheric CO_2; (2) heat waves can result in temperature inversions, leading to trapped masses or unhealthy air contaminants by smog, particulates, and other pollutants; and (3) the incidence of forest fires is increased by drought secondary to climate change and to the lack of spring runoff from reduced winter snows. These fires can create smoke and haze, which can settle over urban populations causing acute and exacerbating chronic respiratory illness.[58]

[56] California Natural Resources Agency, California Climate Adaptation Strategy, https://climateresilience.ca.gov/. Accessed February 2025.

[57] State of California, Department of Justice, Office of the Attorney General, Climate Change Impacts in California, https://oag.ca.gov/environment/impact. Accessed February 2025.

[58] Paul R. Epstein, et al., Urban Indicators of Climate Change, Report from the Center for Health and the Global Environment, (Harvard Medical School and the Boston Public Health Commission, August 2003), unpaginated.

Effects of Global Climate Change

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth's climate system and inability to accurately model it, the uncertainty surrounding climate change may never be completely eliminated. Nonetheless, the IPCC's *Fifth Assessment Report, Summary for Policy Makers* states that, "it is *extremely likely* that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic forces [sic] together."[59] A report from the National Academy of Sciences concluded that 97 to 98 percent of the climate researchers most actively publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity.[60]

According to the CalEPA, the potential impacts in California due to global climate change may include: loss in snow pack; sea level rise; more extreme heat days per year; more high ozone days; more large forest fires; more drought years; increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation.[61] Data regarding potential future climate change impacts are available from CNRA, which in 2009 published the *California Climate Adaptation Strategy*[62] as a response to Executive Order S-13-2008. The CNRA report lists specific recommendations for state and local agencies to best adapt to the anticipated risks posed by a changing climate. In accordance with the *California Climate Adaptation Strategy*, the California Energy Commission (CEC) was directed to develop a website on climate change scenarios and impacts that would be beneficial for local decision makers.[63] The website, known as Cal-Adapt, became operational in 2011.[64] The information provided by the Cal-Adapt website represents a projection of potential future climate scenarios. The data are comprised of the average values from a variety of scenarios and models and are meant to illustrate how the climate may change based on a variety of different potential social and economic factors. Below is a summary of some of the potential climate change effects and relevant Cal-Adapt data, reported by an array of studies that could be experienced in California as a result of global warming and climate change.

[59] IPCC, Climate Change 2014: Synthesis Report, Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, Summary for Policy Makers, 2014, p. 5, http://ipcc.ch/report/ar5/syr/. Accessed February 2025.

[60] Anderegg, William R. L., J.W. Prall, J. Harold, S.H., Schneider, Expert Credibility in Climate Change, Proceedings of the National Academy of Sciences of the United States of America, 2010, 107:12107-12109.

[61] California Environmental Protection Agency (CalEPA), Climate Action Team (CAT), Climate Action Team Report to Governor Schwarzenegger and the Legislature, 2006.

[62] California Natural Resources Agency (CNRA), CAT, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, 2009.

[63] CNRA, CAT, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008.

[64] The Cal-Adapt website: http://cal-adapt.org. Accessed August 2025.

Air Quality

Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would further worsen air quality. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the State.[65]

According to the Cal-Adapt website's "Local Climate Change Snapshot" database, the Project location could see an average annual increase in maximum temperature to 73.8 to 74.6°F in the mid-century (2035–2064) and 74.8 to 77.7°F at the end of the century (2070–2099) compared to 70.8°F for the baseline period (1961–1990). The average annual number of extreme heat days also could increase to 4 to 5 days in the mid-century (2035–2064) and 6 to 14 days at the end of the century (2070–2099) compared to 1 days for the baseline period (1961–1990).[66]

Water Supply

Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, "Considerable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change."[67] For example, some studies identify little change in total annual precipitation in projections for California while others show significantly more precipitation.[68] Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full.[69] Conversely, reductions in spring runoff and higher evapotranspiration because of higher temperatures could reduce the amount of water available for recharge.[70]

According to the Cal-Adapt website's "Local Climate Change Snapshot" database, the Project location could see an average annual length of dry spells of 168 days in the mid-century (2035–2064) and 168 to 177 days at the end of the century (2070–2099), compared to 161 days for the baseline period (1961–1990). The average annual precipitation could decrease to 14.4 to 14.5 inches in the mid-century (2035–

[65] California Energy Commission (CEC), Scenarios of Climate Change in California: An Overview, February 2006.

[66] The Cal-Adapt website: http://cal-adapt.org. Accessed August 2025.

[67] Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

[68] Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

[69] Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

[70] Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

2064) and potentially increase or decrease to 14.8 to 14.6 inches at the end of the century (2070–2099), compared to 14.7 inches for the baseline period (1961–1990).

The California Department of Water Resources report on climate change and effects on the State Water Project (SWP), the Central Valley Project, and the Sacramento-San Joaquin Delta, concludes that "climate change will likely have a significant effect on California's future water resources…[and] future water demand." It also reports that "much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain." It also reports that the relationship between climate change and its potential effect on water demand is not well understood, but "[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future." Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows.[71] In its AR5, the IPCC states "Changes in the global water cycle in response to the warming over the 21st century will not be uniform. The contrast in precipitation between wet and dry regions and between wet and dry seasons will increase, although there may be regional exceptions."[72]

Hydrology and Sea Level Rise

As discussed above, climate changes could potentially affect: the amount of snowfall, rainfall and snowpack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for saltwater intrusion. Sea level rise can be a product of global warming through two main processes: expansion of seawater as the oceans warm and melting of ice over land. Absent planning and preparation, a rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply, and increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture

California has a $30 billion agricultural industry that produces one half of the country's fruits and vegetables. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; without planning and preparations. Crop yield could be threatened by a less reliable water supply. Also, greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thus affect their quality.[73]

Ecosystems and Wildlife

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise by 2 to

[71] California Department of Water Resources, Climate Change Report, Progress on Incorporating Climate Change into Planning and Management of California's Water Resources, July 2006.

[72] IPCC, Fifth Assessment Report, Summary for Policy Makers, p. 20.

[73] California Climate Change Center, Our Changing Climate: Assessing the Risks to California, 2006.

11.5°F (1.1 to 6.4°C) by 2100, with significant regional variation.[74] Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as 2 feet along most of the U.S. coast. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes such as carbon cycling and storage.[75,76]

Existing Conditions

GHG Emissions Inventory

CARB is responsible for the coordination and administration of both federal and State air pollution control programs within California. CARB compiles GHG inventories for the State of California. The most updated inventory reports the State's GHG emissions inventory from calendar year 2022. Based on the year 2022 GHG inventory data (the latest year for which data are available), California emitted 371.1 $MMTCO_2e$ which includes emissions resulting from imported electrical power.[77] Between 1990 and 2022, the population of California grew by approximately 9.2 million (from 29.8 to 39.0 million).[78,79] This represents an increase of approximately 31 percent from 1990 population levels. In addition, the California economy, measured as gross state product, grew from $773 billion in 1990 to $3.6 trillion in 2022, representing an increase of almost five times the 1990 gross state product.[80] Despite the population and economic growth, the State of California achieved its 2020 GHG emission reduction target of reducing emissions to 1990 levels as emissions fell below 431 $MMTCO_2e$ in 2016 and have remained below this limit since that time.[81]

Table 4.6-5 identifies and quantifies statewide anthropogenic GHG emissions and sinks (e.g., carbon sequestration due to forest growth) in 1990 and 2022. As shown in the table, the transportation sector is the largest contributor to statewide GHG emissions at approximately 38 percent in 2022.

Existing Site GHG Emissions

The Project Site is currently occupied by Inglewood High School. The primary campus development is situated in the eastern portion of campus, and consists of classroom and administrative buildings. Currently, athletic courts and fields are located on the western portion of the campus. However, in order to provide a conservative analysis, no credit is taken for existing operational GHG emissions and the Project's GHG emissions are conservatively considered new.

74 National Research Council, Advancing the Science of Climate Change, 2010.

75 Parmesan, C., Ecological and Evolutionary Response to Recent Climate Change, first published on August 24, 2006.

76 Parmesan, C. and Galbraith, H., Observed Ecological Impacts of Climate Change in North America. Arlington, VA: Pew. Cent. Glob. Clim. Change, 2004.

77 CARB, Current California GHG Emission Inventory Data - 2000-2022 GHG Inventory (2024 Edition).

78 United States Census Bureau, State Population by Characteristics: 2020-2023.

79 California Department of Finance, Population and Housing Estimates, E-4 Historical Population Estimates for Cities, Counties, and the State, https://dof.ca.gov/Forecasting/Demographics/Estimates/. Accessed December 2024.

80 California Department of Finance, Gross State Product, https://dof.ca.gov/forecasting/economics/economic-indicators/gross-state-product/. Amounts are based on current dollars as of the date of the report (May 2024).

81 CARB, Current California GHG Emission Inventory Data - 2000-2022 GHG Inventory (2024 Edition).

TABLE 4.6-5
STATE OF CALIFORNIA GHG EMISSIONS

Category	Total 1990 Emissions ($MMTCO_2e$)	Percent of Total 1990 Emissions	Total 2022 Emissions ($MMTCO_2e$)	Percent of Total 2022 Emissions
Transportation	150.7	35%	139.9	37.7%
Electric Power	110.6	26%	59.8	16.1%
Commercial	14.4	3%	14.8	4.0%
Residential	29.7	7%	24.7	6.6%
Industrial	103.0	24%	72.7	19.6%
Recycling and Waste[a]	–	–	8.2	2.2%
High GWP/Non-Specified[b]	1.3	<1%	21.3	5.7%
Agriculture/Forestry	23.6	6%	29.8	8.0%
Forestry Sinks[c]	-6.7	–	–	–
Net Total (IPCC SAR)[d]	**426.6**	**100%**	**371.1**	**100%**
Net Total (IPCC AR4)[e]	**431**	**100%**	**135.8**	**36.8%**

Notes:

a. Included in other categories for the 1990 emissions inventory.
b. High Global Warm Potential (GWP) gases are not specifically called out in the 1990 emissions inventory.
c. Forestry sinks were not calculated for 2020 pending a revised methodology under development. Forestry sinks are ecosystem carbon stored in plants and soils.
d. IPCC = Intergovernmental Panel on Climate Change
e. CARB revised the State's 1990 level GHG emissions using GWPs from the IPCC AR4.

Sources: CARB, California Air Resources Board, California Greenhouse Gas Emissions for 2000 to 2020. Trends of Emissions and Other Indicators. October 26, 2022. https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf. Accessed January 2025

4.6.3 Project Impacts

Thresholds of Significance

The following thresholds of significance are based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would have a significant impact related to GHG emissions if it would:

- **Threshold GHG-1:** Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- **Threshold GHG-2:** Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Amendments to Section 15064.4 of the CEQA Guidelines were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Consistent with existing CEQA practice, CEQA Guidelines Section 15064.4 gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. If a qualitative analysis is used, in addition to quantification, this section recommends certain qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). The

amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CNRA has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and that they should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15064(h)(3)).[82]

Although GHG emissions can be quantified, CARB, SCAQMD, IUSD, nor the City of Inglewood, have adopted a threshold of significance for GHG emissions that would be applicable to this Proposed Project. The LCI released a technical advisory on CEQA and climate change that provided some guidance on assessing the significance of GHG emissions, and states that "lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice," and that while "climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment."[83] Furthermore, the technical advisory states that "CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project."[84]

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project[85]. To qualify, such a plan or program 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.[86] Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of GHG emissions."[87] Thus, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with a program and/or other regulatory schemes to reduce GHG emissions.

In the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if the Project is found to be consistent with the applicable regulatory plans and policies

[82] See generally CNRA, Final Statement of Reasons for Regulatory Action (December 2009), pp. 11-13, 14, 16; see also Letter from Cynthia Bryant, Director of the Office of Land Use and Climate Innovation (LCI) (formerly Office of Planning and Research) to Mike Chrisman, Secretary for Natural Resources, April 13, 2009.

[83] Governor's Office of Land Use and Climate Innovation (LCI) (formerly Office of Planning and Research), Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008.

[84] Governor's Office of Land Use and Climate Innovation (LCI) (formerly Office of Planning and Research), Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008.

[85] CCR, Title 14, Section 15064(h)(3).

[86] CCR, Title 14, Section 15064(h)(3).

[87] CCR, Title 14, Section 15064(h)(3).

to reduce GHG emissions, including the emissions reduction measures discussed within CARB's Climate Change Scoping Plan, Connect SoCal, and City of Inglewood's plans, programs, and policies including EECAP established for the purpose of increasing energy efficiency and reducing GHG emissions.

SCAQMD Thresholds

As discussed above, SCAQMD has an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for stationary source/industrial projects where SCAQMD is the lead agency. This SCAQMD interim GHG significance threshold is not applicable to the Project because it is a school renovation project, and the City is the Lead Agency.

Methodology

Project GHG Emissions Estimates

For informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which requires a good-faith effort by the lead agency 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. The significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project and is evaluated solely on the basis of consistency with GHG reduction plans, policies, and regulations.

The Climate Action Registry General Reporting Protocol provides procedures and guidelines for calculating and reporting GHG emissions from general and industry-specific activities. Although no numerical thresholds of significance have been adopted, and no specific protocols are available for land use projects, the General Reporting Protocol provides a framework for calculating and reporting GHG emissions from the Project. The GHG emissions provided in this report are consistent with the General Reporting Protocol framework. For the purposes of this Draft EIR, total GHG emissions (i.e., construction and operation) from the Project were quantified to provide information to decision makers and the public regarding the level of the Project's annual GHG emissions. GHG emissions are typically separated into three categories that reflect different aspects of ownership or control over emissions:

- Scope 1: Direct, on-site and off-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, diesel, and transportation fuels).
- Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy.[88]

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility: "As facilities consider changes that would affect their emissions – addition of a cogeneration unit to boost overall efficiency even as it increases direct emissions, for example – the relative impact on total (direct plus indirect) emissions by the facility should be monitored. Annually

[88] Embodied energy includes energy required for water pumping and treatment for end-uses.

reported indirect energy usage also aids the conservation awareness of the facility and provides information" to CARB to be considered for future strategies by the industrial sector.[89] For these reasons, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, LCI directs lead agencies to "make a good-faith effort, based on available information, to calculate, model, or estimate…GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities."[90] Therefore, direct and indirect emissions have been calculated for the Project.

A fundamental challenge in the analysis of GHG emissions is the global nature of the existing and cumulative future conditions. Changes in GHG emissions can be difficult to attribute to a particular project because the project may cause a shift in the locale for some type of GHG emissions, rather than simply causing "new" GHG emissions. As a result, there is a lack of clarity as to whether a project's GHG emissions represent a net global increase, reduction, or no change in GHGs that would exist if the project were not implemented. Therefore, the analysis of the Project's GHG emissions is conservative in that it assumes all of the GHG emissions are new additions to the atmosphere.

For purposes of this analysis, it was considered reasonable, and consistent with criteria pollutant calculations, to consider GHG emissions resulting from direct Project-related activities, including use of vehicles, and natural gas, to be new emissions. These emissions include Project construction activities such as demolition, hauling, and construction worker trips, as well as operational emissions. This analysis also considers indirect GHG emissions from water conveyance, wastewater generation, and solid waste handling. Since potential impacts resulting from GHG emissions are long-term rather than temporary, GHG emissions were calculated on an annual basis. As discussed above, in order to provide a conservative analysis, no credit is taken for existing greenhouse gas emissions and the Project's greenhouse gas emissions are conservatively considered new.

GHG emissions for the Project are estimated using CalEEMod (Version 2022.1), which is a statewide land use emission computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California and is recommended by SCAQMD. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California. Mobile source emissions have been estimated based on CARB's on-road vehicle emissions factor (EMFAC2021) model.

As discussed previously, the City EECAP contains GHG reduction activities and strategies. In addition, SCAG has adopted Connect SoCal applicable to the region, which outlines SCAG's plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The Connect

[89] California Air Resources Board, Staff Report: Initial Statement of Reasons for Rulemaking, Revisions to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), 2010, page 27.

[90] Governor's Office of Planning and Research, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008, page 5.

SoCal 2024 focuses the majority of new housing and job growth in High Quality Transit Corridors (HQTC) and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development (TOD) and demonstrates a reduction in per capita GHG emissions relative to 2005 of eight percent in 2020 and 19.8 percent by 2035. The project-level analysis describes the consistency of the Project's GHG emission sources with local and regional GHG emissions reduction strategies.

Construction Emissions

The emissions of GHGs associated with construction of the Project were calculated for each year of construction activity using CalEEMod. Construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date). Project construction is expected to occur over approximately 24 months. If the onset of construction is delayed to a later date than assumed in the modeling analysis, construction impacts would be similar to or less than those analyzed, because a more energy-efficient and cleaner burning construction equipment and vehicle fleet mix would be expected in the future. This is because State regulations require construction equipment fleet operators to phase-in less polluting heavy-duty equipment over time. As a result, should the Project commence construction on a later date than modeled in this GHG impact analysis, GHG impacts would be less than the impacts disclosed herein.

Project construction activities would include demolition, grading, building construction, architectural coating, utilities, site improvement work, landscaping paving, and building repair work. Demolition activities would generate demolition debris (asphalt and general construction debris), which would require transport by haul truck. Grading activities would require imported soil, which would require transport by haul truck. Landscaping and paving activities would also require transported materials by haul truck. Heavy-duty construction equipment, vendor supply trucks and concrete trucks would be used during building repair work, paving and construction of the new buildings.

The output values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the same construction phasing assumptions used in the criteria pollutant analysis in Section 4.2, *Air Quality*, to generate GHG emissions values for each construction year.

SCAQMD's *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold* recognizes that construction-related GHG emissions from projects "occur over a relatively short-term period of time" and that "they contribute a relatively small portion of the overall lifetime project GHG emissions."[91] The guidance recommends that construction project GHG emissions should be "amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies."[92] In accordance with that SCAQMD guidance, GHG emissions from construction have been amortized over the 30-year lifetime of the Project.

[91] SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf?sfvrsn=2. Accessed February 2025.

[92] SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf?sfvrsn=2. Accessed April 2025.

Operational Emissions

Operation of the Project would generate GHG emissions from on-site operations such as natural gas combustion for heating, landscaping equipment and the use of consumer products. CalEEMod was used to estimate operational GHG emissions from electricity, natural gas, solid waste, water and wastewater, refrigerants and landscaping equipment. GHG emissions would also be generated by Project-generated vehicle trips. Operational impacts were assessed for the first full Project buildout year in 2028.

Project energy demand and the consumption of fossil fuels to generate electricity and to provide space heating and cooling and hot water generates GHG emissions. Emissions of GHGs associated with energy usage under the Project's proposed land uses are calculated using the CalEEMod tool. Future fuel consumption rates are estimated based on specific square footage of the Project's school buildings and vehicular parking land uses. The Project's water supply was estimated within Caleemod defaults for the proposed land uses. The Project's electricity and natural gas demand for the operation of the educational and recreational land uses were calculated using demand factors provided in CalEEMod. Additional electricity usage related to the recreational uses, including the sports fields, courts and landscaped areas, was estimated in the Project's Illumination Study and incorporated in CalEEMod.[93] The Project uses a CO_2e intensity factor based on CalEEMod forecasted future year carbon intensities that reflect utility-specific planning considerations, including future integration of renewables for 2028 including SB 100 requirements, which requires local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by 2027, 60 percent by 2030, and 100 percent by 2045. While the Project would be required to comply with the 2025 Title 24 Building Energy Efficiency Standards (which are effective for building permit applications that are applied for on or after January 1, 2026), CalEEMod estimates Project energy demand using energy demand which are based on consumption estimates from the CEC's 2018–2030 Uncalibrated Commercial Sector Forecast and the 2019 Residential Appliance Saturation Survey. As explained in Appendix D, *Technical Source Documentation for Emissions Calculations*, of the CalEEMod User Guide, although the Commercial Forecast and RASS were both completed for 2019, that does not mean the energy intensity estimates derived from these datasets are representative of buildings constructed in compliance with the energy efficiency requirements of the 2019 or 2022 Energy Code.[94] Therefore, the default energy consumption estimates provided in CalEEMod are very conservative, overestimating expected energy use and associated GHG emissions compared to what would be expected for new buildings subject to the latest Energy Code with more stringent energy efficiency measures. Thus, the analysis of building energy-related GHG emissions does not reflect additional building energy reductions and associated GHG emissions reductions from 2025 Title 24 compliance. The Project's GHG analysis conservatively assumes the Project will remain with SCE as their electricity provider and will not take additional credit for renewable energy beyond the expected SCE renewable energy percentage for year 2028 based on the future trend under SB 100 and CalEEMod forecasted future year carbon intensities.[95]

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93 Musco Sports Lighting LLC. 2025. Inglewood High School Illumination Study.

94 California Air Pollution Control Officers Association, California Emissions Estimator Model - Appendix D, *Technical Source Documentation for Emissions Calculations*, 2022, https://caleemod.com/user-guide.

95 For the purposes of estimating GHG emissions in this Draft EIR, the emissions analysis conservatively assumes Project would not switch electricity providers from SCE to the Clean Power Alliance (CPA) (i.e., does not take any credit for 36 percent, 50 percent, or 100 percent renewable electricity, depending on the selected CPA plan). Should the Project switch electricity providers from SCE to the CPA, the Project's electricity-related emissions would be lower than those disclosed in this section if they chose 50 or 100 percent renewable electricity.

Mobile emissions were estimated based on CalEEmod default emission factors from the Project's trip generation estimates, provided by the Project's Vehicle Miles Traveled (VMT) Screening Assessment for the Project prepared by LLG Consulting, Inc, dated September 18, 2025, included as Appendix I of this Draft EIR. The Project is forecast to generate approximately 1,536 daily weekday trips. Saturday trips are estimated at 2,392 total daily trips, primarily associated with the new or upgraded recreational facilities, including playing fields, basketball courts, and tennis courts, as well as the estimated net increase of 40 staff members. [96]

Emissions of GHGs associated with solid waste disposal under the Project's proposed land uses are calculated using the CalEEMod tool. The emissions are based on the size of the Project's school uses, the waste disposal rate for the land uses are estimated based on solid waste generation factors from the California Department of Resources and Recycling and Recovery as describe in the Project's Initial Study, and the GHG emission factors for solid waste decomposition.[97] The GHG emission factors, particularly for CH_4, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. The default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery) are statewide averages and are used in this assessment. In addition, a 50 percent diversion rate of solid waste is assumed for the Project.

The emissions of GHGs associated with water demand and wastewater generation from the Project are calculated using CalEEMod. The emissions are based on the size of the Project land uses, landscaped area, the water demand factors, the electrical intensity factors for water supply, treatment, and distribution for wastewater treatment, the GHG emission factors for the electricity utility provider, and the GWP values for the GHGs emitted.

The emissions of GHGs associated with operational area sources under the Project are calculated using the CalEEMod tool. The emissions for landscaping equipment are based on the size of the open space based on the Project's land uses, the GHG emission factors for fuel combustion, and the GWP values for the GHGs emitted. Refrigerant emissions are based on Project land use type since different types of refrigeration equipment are used by different types of land uses. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing of the refrigeration equipment lifetime, and then derives average annual emissions from the lifetime estimate. As discussed above, in order to provide a conservative analysis, no credit is taken for existing greenhouse gas emissions and the Project's greenhouse gas emissions are conservatively considered new.

Consistency with GHG Reduction Plan, Policies, and Actions

The Project's potential for GHG impacts is also evaluated by assessing the Project's consistency with applicable GHG reduction strategies and local actions adopted by CARB, SCAG, and the City. As there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on whether the Project is not in conflict with, and therefore is consistent with, Statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency

[96] LLG Consulting, Inc. 2025. Vehicle Miles Traveled Screening Assessment, September 2025. Provided in Appendix I of this Draft EIR

[97] Please refer to Appendix A-2 of this Draft EIR for a copy of the Initial Study and additional information regarding Project's solid waste generation.

with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment consistent with CEQA Guidelines Section 15064.4 and CEQA Guidelines Appendix G. Based on CEQA case law, when no guidance exists, the lead agency may look to and assess general compliance with comparable regulatory schemes.[98]

A consistency analysis is provided and describes the Project's compliance with performance-based standards included in the regulations outlined in the applicable portions of CARB's 2022 Climate Change Scoping Plan, Connect SoCal 2024, and the City's EECAP policies.

For this Project, the District serves as the lead agency. LCI encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. The City of Inglewood does not have a programmatic mitigation plan to tier from, such as a GHG Emissions Reduction Plan as recommended in the CEQA Guidelines. However, the City of Inglewood has adopted the EECAP contains several GHG reduction measures and energy efficiency measures. In addition, the California CAT Report provided recommendations for specific emission reduction strategies for reducing GHG emissions and reaching the targets established in HSC Division 25.5. Thus, if the Project is designed and operated in accordance with these policies and regulations, it would result in a less than significant impact, because it would be consistent with the overarching State regulations on GHG reductions.

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA)." [99]

The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, the State recognizes that almost 50% of jurisdictions do not have an adopted CAP, among other reasons because they are costly, requiring technical expertise, staffing, funding. Additionally, CAPs need to be monitored and updated as State targets change and new data is available. Jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas when developing local climate plans, measures, policies, and actions. "By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction." [100]

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98 See Protect Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal. App. 4th 1099, 1107 ["'[A] lead agency's use of existing environmental standards in determining the significance of a project's environmental impacts is an effective means of promoting consistency in significance determinations and integrating CEQA environmental review activities with other environmental program planning and resolution."'"]. Lead agencies can, and often do, use regulatory agencies' performance standards. A project's compliance with these standards usually is presumed to provide an adequate level of protection for environmental resources. See, e.g., Cadiz Land Co. v. Rail Cycle (2000) 83 Cal.App.4th 74, 99 (upholding use of regulatory agency performance standard).

99 CARB, Final 2022 Climate Change Scoping Plan – Appendix D: Local Actions, November 2022.

100 CARB, Final 2022 Climate Change Scoping Plan – Appendix D: Local Actions, November 2022.

The State also recognizes in Appendix D, Local Actions, of the Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the need for housing while demonstrating that a Project is in alignment with the State's Climate Goals.[101] The State calls for the climate crisis and the housing crisis to be confronted simultaneously. Jurisdictions should avoid creating targets that are impossible to meet as a basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State's climate goals, like infill development, low-income housing or solar arrays, is not consistent with the State's goals. The State also recognizes the lead agencies' discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

Analysis of Project Impacts

Impact GHG-1: The Project would have a significant impact if it would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Impact GHG-2: The Project would have a significant impact if it would conflict with any applicable plan, policy, regulation, or recommendation of an agency adopted for the purpose of reducing the emissions of GHGs.

Impact Analysis

Quantification of Project Emissions

Construction

Construction activities associated with the Project would result in emissions of CO_2 and, to a lesser extent, CH_4 and N_2O. Construction of the Project has the potential to generate GHG emissions through the use of heavy-duty construction equipment, such as backhoes, loaders, dozers, graders, and other equipment; and through vehicle trips generated by workers, haul trucks, and vendor trucks traveling to and from the site. Mobile source GHG emissions would result from the use of construction equipment and worker vehicles and trucks. Construction-period GHG emissions were quantified based on the same construction schedule and activities as described in Section 4.2, *Air Quality* of this Draft EIR. To amortize the emissions over the life of a project, SCAQMD recommends calculating the total GHG emissions attributable to construction activities, dividing it by a 30-year project life, and then adding that number to a project's annual operational-phase GHG emissions. As such, construction emissions were amortized over a 30-year period and included in the Project's annual operational-phase GHG emissions shown in Table 4.6-6 below.

Operation

Operational activities associated with the Project would also result in emissions of CO_2 and, to a lesser extent CH_4 and N_2O. Operational sources of GHG emissions would include area and landscaping related emissions, mobile emissions, and indirect GHG emissions from export of electricity, water consumption,

[101] The State recognizes the need for 2.5 million housing units over the next eight years, with one million being affordable units. See page 20, Appendix D, 2022 Scoping Plan Update, November 2022.

and waste generation. The Project's annual GHG emissions are shown in **Table 4.6-6**.[102] As shown, the Project's total GHG emissions would be 1,874 $MTCO_2e$.

TABLE 4.6-6
ANNUAL PROJECT GREENHOUSE GAS EMISSIONS

Emissions Sources	CO_2e (Metric Tons per Year)[a]
Mobile	1,026
Area	5
Energy	628
Water	25
Waste	44
Refrigerants	<1
Construction[b]	145
Project Total GHG Emissions	***1,874***

Notes:
a. Totals may not add up exactly due to rounding in the modeling calculations. Refer to Appendix C for details.
b. Construction emissions are amortized over 30 years.
Source: ESA 2025

Consistency with Plans

City of Inglewood

The City of Inglewood General Plan Environmental Justice Element presents several goals and policies that encourage energy efficiency, sustainable transportation, and other measures that would reduce the GHG emissions associated with development in the City. These policies, include EJ-2.4, EJ-3.1, EJ-3.2, EJ-3.3, and EJ-3.4, which promote active transportation and transit use and aim to reduce transportation-related emissions. The Project would promote active transportation by providing 32 bicycle parking spaces and 8 covered staff bicycle parking spaces. The Project would promote transit use through its location adjacent to existing Los Angeles County Metropolitan Transportation Authority (Metro)bus stops providing convenient access to public transit for students, staff, and visitors). The Project would provide pedestrian circulation improvements through upgraded sidewalks, barrier-free pathways, ADA-compliant entries, and improved lighting and landscaping that would improve walkability on-site and towards off-site transit stops, such as the existing bus stops located along Manchester Boulevard, east and west of Grevillea Avenue, and along Eucalyptus Avenue at Kelso Street. These features of the Project would encourage non-vehicular modes of transportation and align with the City's goals of increasing active and sustainable travel. The Project would also be consistent with Policy EJ-2.8, which relates to the reduction of VMT to reduce emissions. The Project would redevelop an existing school site, located within an already built environment and in close proximity to existing transit stops and downtown Inglewood amenities. These features would reduce reliance on single-occupancy vehicles and the associated GHG emissions. Additionally, the Project would include 25 electric vehicle (EV) parking spaces, including 6

[102] Project operational GHG emissions in Table 4.6-6 do not include subtracting emissions associated with the existing classroom buildings to be demolished as part of the Proposed Project. Therefore, operational emissions would be lower than those presented and the Project's operational GHG emissions are conservatively considered as new.

with charging stations, and would further reduce transportation emissions. Therefore, the Project would be consistent with the Environmental Justice Element's goals.

The City of Inglewood has also adopted the EECAP, which includes strategies to improve energy efficiency and reduce GHG emissions within the City. More specifically, EECAP Measures 3.4 and 4.1 aim to encourage energy retrofits for existing buildings and the enhanced energy efficiency design in new development. Consistent with these strategies, the Project would install lighting and a ventilation system that conforms to the CALGreen Code and applicable Title 24 Standards. The Project would be replacing and upgrading buildings, which would integrate newer, more efficient lighting systems that would utilize less energy. In addition, the Project would include EV spaces and charging stations, bicycle parking spaces, and is located in an urban area with readily accessible transit locations. As previously described, the Project would include EV parking spaces, including charging stations, as well as bicycle parking, would be located adjacent to a variety of existing transportation facilities, and would be served by several bus stops. The Project would promote new energy efficient systems, as well as improvements to existing buildings, in accordance with EECAP measures, and would encourage sustainable transportation methods.

The EECAP Measure 5.1 promotes water efficient design and Measure 6.1 promotes tree planting. The Project would implement landscaping improvements that would consist of the installation of drought tolerant, low maintenance plants throughout the campus, and all existing irrigation would be removed and replaced with a water-efficient irrigation system with a smart weather-based controller. All landscaping would be designed to use recycled water for irrigation. The energy efficient and upgraded watering systems would help limit the indirect GHG emissions associated with the treatment and transport of water. The Project involves reconstruction of Inglewood High School, which will continue to serve local students, faculty, and community members, including through use of recreational amenities such as playing fields and courts. The Project's features would be consistent with the GHG reduction strategies within the City's EECAP.

2022 Scoping Plan Update

As shown in Table 4.6-6 above, the Project's highest GHG contributors would be from mobile and energy sources. These are highly regulated sources with measures implemented in CARB's 2022 Climate Scoping Plan to reduce GHG emissions from each sector. The 2022 Scoping Plan expands on prior Scoping Plans and responds to more recent legislation by outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target of reducing anthropogenic emissions to 85 percent below 1990 levels and achieving carbon neutrality by 2045 or earlier. The 2022 Scoping Plan's main strategy is to achieve carbon neutrality through the aggressive reduction of fossil fuels currently used in California.

Specifically, the 2022 Scoping Plan identifies the three priority areas (transportation electrification, VMT reduction, and building decarbonization) for local jurisdictions to take climate action. The 2022 Scoping Plan presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas outlined specifically, Table 3 of Appendix D.

The Project would not conflict with the 2022 Scoping Plan's goals of transportation electrification. With the Project's inclusion of 25 EV parking spaces, including 6 charging stations, this would provide EV

charging infrastructure and would promote the zero emission vehicle and sustainable transportation goals outlined in the 2022 Scoping Plan. Furthermore, that State continues to build and accelerate carbon reduction programs, including programs aimed to increase rapidly increasing zero-emission transportation, and electrifying the cars, buses, trains, and trucks. In addition, State regulations regulating mobile sources, such as the LCFS and ACC programs continue to drive the reduction of GHG emissions within the transportation sector. As such, mobile source GHG emissions associated with the Project would decrease in future years as State regulations are mandated and implemented.

The Project would not conflict with the 2022 Scoping Plan's goals related to VMT reduction. As previously mentioned, The Project involves the reconstruction of an existing school site, located within an already built environment that is already served by existing utilities and services. Furthermore, the Project Site is located in close proximity to existing transit stops and downtown Inglewood amenities, promoting walkability to off-site existing bus stops located along Manchester Boulevard, east and west of Grevillea Avenue, and along Eucalyptus Avenue at Kelso Street. The Project would also support bicycle infrastructure and accessibility by providing 32 bicycle parking spaces and 8 covered staff bicycle parking spaces. These features of the Project would all potentially reduce VMT associated with the Project in accordance with the goals of the 2022 Scoping Plan. For more information on how the Project would support local sustainable transportation goals, see Section 4.8, *Transportation*, of this Draft EIR.

The Project would not conflict with the 2022 Scoping Plan's building decarbonization goals. As previously mentioned, the Project would promote on-site energy efficiency through drought-tolerant landscaping and new water-efficient irrigation system improvements as well as provide at least 15 percent of the total roof area to be solar ready as required by the California Energy Code Section 110.10B. Furthermore, as described in Section 3.0, *Project Description*, of this Draft EIR, the Project would integrate energy-efficient systems within the new and retrofitted buildings and would comply with CALGreen Code and applicable Title 24 Standards. The Project involves reconstruction of Inglewood High School, which will continue to serve local students, faculty, and community members, including through use of recreational amenities such as playing fields and courts. The land uses associated at the Project Site would remain unchanged and would not introduce any new substantial sources of GHG emissions. This would promote the efficient use of energy resources for on-site improvements and building decarbonization, as envisioned in the 2022 Scoping Plan.

With respect to renewable energy, the RPS requires publicly owned utilities and retail sellers of electricity in California to procure 44 percent of their electricity sales from eligible renewable sources by 2024, 52 percent by the end of 2027, 60 percent by the end of 2030 and 100 percent by the end of 2045. SCE, the utility provider for the Project Site, reported 37.6 percent of their power from renewable sources (SCE 2024). Therefore, with SCE required compliance with the RPS, GHG emissions from electricity consumption on the Project Site would decrease in future years.

Connect SoCal 2024

The SCAG Regional Council adopted the 2024–2050 RTP/SCS, also known as Connect SoCal 2024, on April 4, 2024. Connect SoCal 2024 includes compact and mixed-use development strategies that will "prioritize walkability and create livable neighborhoods with ample green spaces, public amenities and affordable housing options." The Project would redevelop an existing school and would involve circulation improvements including additional parking lots spaces with EV charging stations, fire lanes,

and pedestrian circulation paths allow for more efficient access. The Project location is in close proximity to a variety of existing transportation facilities and is surrounded by a variety of land uses. The Project Site is served by several bus stops which includes the Metro bus 115 and bus 211/215 and is within walking distance to the downtown Inglewood shops and restaurants. The proximity to transit stops as well as the proximity to various land uses would promote the mixed-use development strategies envisioned by Connect SoCal 2024. Furthermore, the Project would also provide 25 EV parking spaces, including 6 stalls with charging stations, as well as 32 bicycle parking spaces and 8 covered staff bicycle parking spaces, that would further promote non-vehicular forms of transportation and reduction of associated GHG emissions. Therefore, the Project would not conflict with the Connect SoCal 2024 goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce vehicular demand and associated emissions.

Overall, the Project would not conflict with CARB's implementation of the LCFS or use of renewable energy sources, the City's EECAP, and it would not conflict with SCAG's Connect SoCal 2024. In addition, the Project would be consistent with the 2022 Scoping Plan Update as the Project would encourage zero-emission transportation by providing EV charging stations and bicycle parking. Therefore, the Proposed Project would not generate GHG emissions that would have a significant impact on the environment and would not conflict with an applicable plan, policy, or regulation to reduce GHG emissions. As such, impacts would be less than significant.

4.7 Noise

4.7.1 Introduction

This section analyzes potential noise and vibration impacts that would result from the Project. The analysis describes the existing noise environment in the vicinity of the Project Site, estimates future noise and vibration levels at surrounding land uses resulting from construction and operation of the Project, identifies the potential for significant impacts, and includes mitigation measures to address significant impacts. An evaluation of the Project's contribution to potential cumulative noise impacts is also provided. Noise worksheets and technical data used in this analysis are provided in Appendix G, Noise Documentation, of this Draft EIR.

The analysis included in this section was developed based on ambient noise measurements taken by ESA and presented in Appendix G; Project-specific construction data and assumptions (including construction schedule, phasing, and equipment provided by the applicant team); characteristics of the Proposed Project described in Chapter 3, Project Description, and the transportation analysis presented in Section 4.8, Transportation and Circulation, and Appendix H.

4.7.2 Noise and Vibration Basics

Noise Principles and Descriptors

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is generally defined as undesirable (i.e., loud, unexpected, or annoying) sound. Acoustics is defined as the physics of sound and addresses its propagation and control.[1] In acoustics, the fundamental scientific model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determine the sound level and characteristics of the noise perceived by the receiver.

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement and reflects the way people perceive changes in sound amplitude[2]. The dB scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to the threshold of human hearing and 120 to 140 dB corresponding to the threshold of feeling pain. Pressure waves traveling through air exert a force registered by the human ear as sound.[3]

[1] California Department of Transportation (Caltrans), Technical Noise Supplement (TeNS) to the Traffic Noise Analysis Protocol, Section 2.2.1, September 2013.

[2] All sound levels measured in decibel (dB), as identified in the noise calculation worksheets included in Appendix G of this Draft EIR and in this section of the Draft EIR, are relative to $2x10^{-5}$ N/m^2.

[3] Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.3, September 2013.

Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. Typically, sound does not consist of a single frequency, but, rather, a broad band of frequencies varying in levels of magnitude. When all of the audible frequencies of a sound are measured, a sound spectrum is plotted consisting of a range of frequencies spanning 20 to 20,000 Hz. The sound pressure level, therefore, constitutes the additive force exerted by a sound corresponding to the sound frequency/sound power level spectrum.[4]

The typical human ear is not equally sensitive to the frequency range from 20 to 20,000 Hz. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to these extremely low and extremely high frequencies. This method of frequency filtering or weighting is referred to as A-weighting, expressed in units of A-weighted decibels (dBA), which is typically applied to community noise measurements.[5] Some representative common outdoor and indoor noise sources and their corresponding A-weighted noise levels are shown in **Figure 4.7-1**.

Noise Exposure and Community Noise

Community noise exposure is typically measured over a period of time; a noise level is a measure of noise at a given instant in time. Community noise varies continuously over a period of time with respect to the sound sources contributing to the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with many unidentifiable individual contributors. Single-event noise sources, such as aircraft flyovers, sirens, etc., may cause sudden changes in background noise level.[6] However, generally, background noise levels change gradually throughout the day, corresponding with the addition and subtraction of distant noise sources, such as changes in traffic volume.

These successive additions of sound to the community noise environment change the community noise level from moment to moment, requiring the noise exposure to be measured over periods of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts. The following noise descriptors are used to characterize environmental noise levels over time.[7]

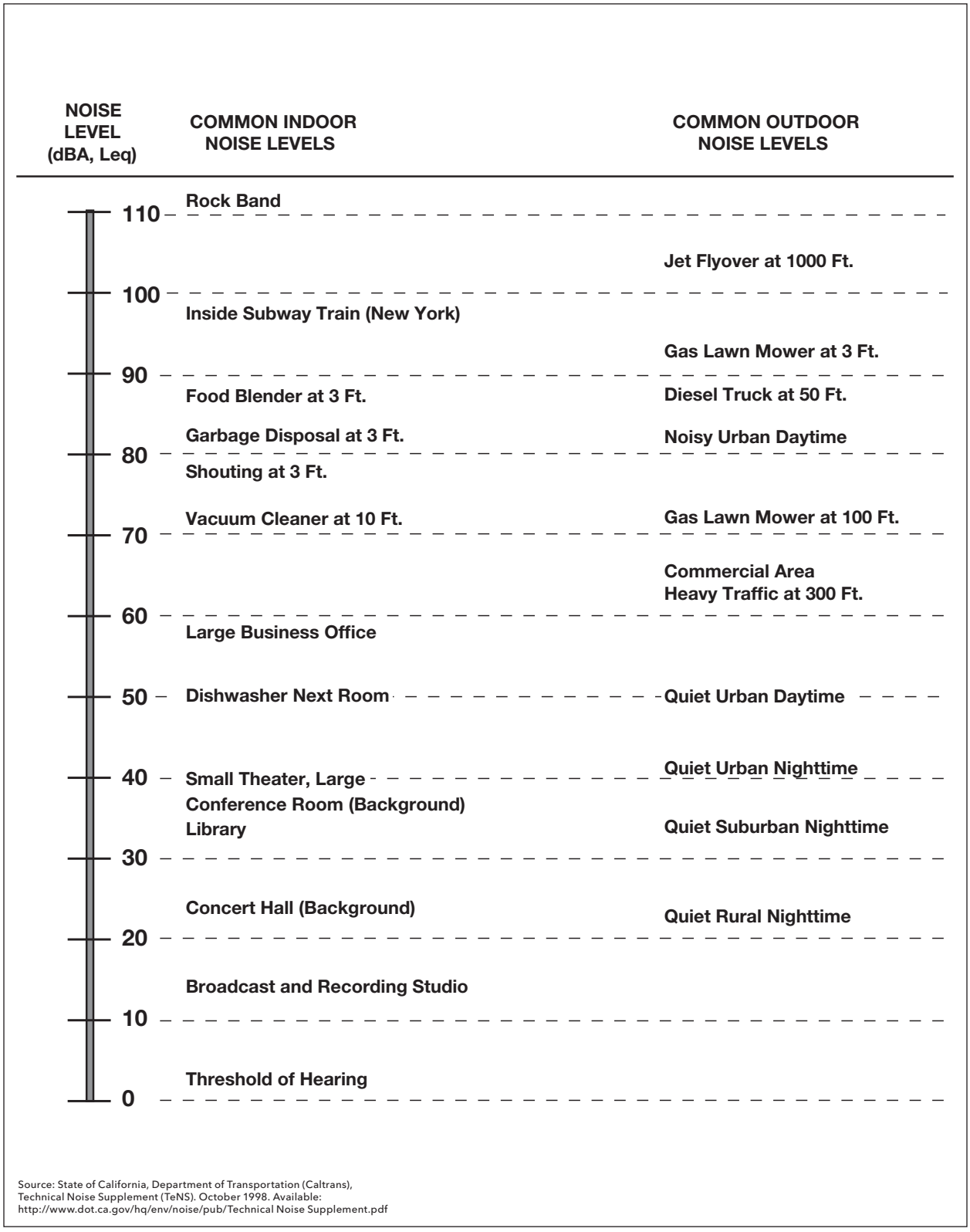
L_{eq}: The equivalent sound level over a specified period of time, typically, 1 hour (L_{eq}). The L_{eq} may also be referred to as the average sound level.

L_{max}: The maximum, instantaneous noise level experienced during a given period of time.

L_{min}: The minimum, instantaneous noise level experienced during a given period of time.

L_x: The noise level exceeded a percentage of a specified time period. For instance, L_{50} and L_{90} represent the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.

4 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.3, September 2013.
5 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.3, September 2013.
6 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1, September 2013.
7 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.2, September 2013.



Source: State of California, Department of Transportation (Caltrans), Technical Noise Supplement (TeNS). October 1998. Available: http://www.dot.ca.gov/hq/env/noise/pub/Technical Noise Supplement.pdf

D202400867.01 - Inglewood High School Reconstruction\05 Graphics-GIS-Modeling-USE AZUREDEIR

Figure 4.7-1
Decibel Scale and Common Noise Sources
Inglewood High School Reconstruction

ESA

L_{dn}: The average A-weighted noise level during a 24-hour day, obtained after an addition of 10 dBA to measured noise levels between the hours of 10:00 p.m. to 7:00 a.m. the next day to account for nighttime noise sensitivity. The L_{dn} is also termed the day-night average noise level (DNL).

CNEL: The Community Noise Equivalent Level (CNEL) is the time average A-weighted noise level during a 24-hour day that includes an addition of 5 dBA to measured noise levels between the hours of 7:00 p.m. to 10:00 p.m. and an addition of 10 dBA to noise levels between the hours of 10:00 p.m. to 7:00 a.m. the next day to account for noise sensitivity in the evening and nighttime, respectively.

Effects of Noise on People

Noise is generally loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity that is a nuisance or disruptive. The effects of noise on people can be placed into four general categories:

- Subjective effects (e.g., dissatisfaction, annoyance);
- Interference effects (e.g., communication, sleep, and learning interference);
- Physiological effects (e.g., startled response); and
- Physical effects (e.g., hearing loss).

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects interrupt daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and interference with sleep.[8]

The World Health Organization's Guidelines for Community Noise details the adverse health effects of high noise levels, which include hearing impairment, speech intelligibility, sleep disturbance, physiological functions (e.g., hypertension and cardiovascular effects), mental illness, performance of cognitive tasks, social and behavioral effects (e.g., feelings of helplessness, aggressive behavior), and annoyance.[9]

With regard to the subjective effects, the responses of individuals to similar noise events are diverse and influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity. Overall, there is no completely satisfactory way to measure the subjective effects of noise, or the corresponding reactions of annoyance and dissatisfaction on people. A wide variation in individual thresholds of annoyance exists, and different tolerances to noise tend to develop based on an individual's past experiences with noise. Thus, an important way of predicting a human reaction to a new noise environment is the way it compares to the existing

[8] World Health Organization Team, edited by Berglund, Birgitta; Lindvall, Thomas; Schwela, Dietrich H, Guidelines for Community Noise, 1999.

[9] World Health Organization Team, edited by Berglund, Birgitta; Lindvall, Thomas; Schwela, Dietrich H, Guidelines for Community Noise, 1999.

environment to which one has adapted (i.e., comparison to the ambient noise environment). In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be judged by those hearing it. With regard to increases in A-weighted noise level, the following relationships generally occur:[10]

- Except in carefully controlled laboratory experiments, a change of 1 dBA in ambient noise levels cannot be perceived;
- Outside of the laboratory, a change of 3 dBA in ambient noise levels is considered to be a barely perceivable difference;
- A change of 5 dBA in ambient noise levels is considered to be a readily perceivable difference; and
- A change of 10 dBA in ambient noise levels is subjectively heard as doubling of the perceived loudness.

These relationships between change in noise level and human hearing response occur in part because of the logarithmic nature of sound and the dB scale. Because the dBA scale is based on logarithms, two noise sources do not combine in a simple additive fashion, but, rather, logarithmically. Under the dBA scale, a doubling of sound energy corresponds to a 3 dBA increase. In other words, when two sources are each producing sound of the same loudness, the resulting sound level at a given distance would be approximately 3 dBA higher than one of the sources under the same conditions, corresponding to a barely perceivable increase in sound with respect to human hearing. For example, if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA. Under the dB scale, three sources of equal loudness together produce a sound level of approximately 5 dBA louder than one source, and 10 sources of equal loudness together produce a sound level of approximately 10 dBA louder than the single source.[11]

Noise Attenuation

When noise propagates over a distance, the noise level reduces, or attenuates, with distance depending on the type of noise source and the propagation path. Noise from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, referred to as "spherical spreading." The rate of sound attenuation for a point source, such as a piece of mechanical or electrical equipment (e.g., air conditioner) or idling vehicle (e.g., bulldozer), is 6 dBA per doubling of distance from the noise source to the receptor over acoustically "hard" sites and 7.5 dBA per doubling of distance from the noise source to the receptor over acoustically "soft" sites.[12] Hard sites are those with a reflective surface between the source and the receiver, such as asphalt or concrete surfaces or smooth bodies of water. No excess ground attenuation is assumed for hard sites and the reduction in noise levels with distance (drop-off rate) is simply the geometric spreading of the noise from the source. Soft sites have an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees, which in addition to geometric spreading, provides an excess ground attenuation value of 1.5 dBA (per doubling distance).[13] For example, an outdoor condenser fan that generates a sound level of 60 dBA at a distance of 50 feet from a point source at an

[10] Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1, 2013.
[11] Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1.1, September 2013.
[12] Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Sections 2.1.4.1 and 2.1.4.2, September 2013.
[13] Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Sections 2.1.4.1 and 2.1.4.2, September 2013.

acoustically hard site would attenuate to 54 dBA at a distance of 100 feet from the point source and attenuate to 48 dBA at 200 feet from the point source.

Roadways and highways consist of several localized noise sources on a defined path, and, hence, are treated as "line" sources, which approximate the effect of several point sources.[14] Noise from a line source propagates over a cylindrical surface, often referred to as "cylindrical spreading."[15] Line sources (e.g., traffic noise from vehicles) attenuate at a rate between 3 dBA for hard sites and 4.5 dBA for soft sites for each doubling of distance from the reference measurement.[16] Therefore, noise due to a line source attenuates less with distance than that of a point source with increased distance.

Structures (e.g., buildings and solid walls) and natural topography (e.g., hills and berms) that obstruct the line-of-sight between a noise source and a receptor further reduce the noise level if the receptor is located within the "shadow" of the obstruction, such as behind a sound wall. This type of sound attenuation is known as "barrier insertion loss." If a receptor is located behind the wall but still has a view of the source (i.e., the line-of-sight is not fully blocked), barrier insertion loss would still occur but to a lesser extent. Additionally, a receptor located on the same side of the wall as a noise source may actually experience an increase in the perceived noise level as the wall can reflect noise back to the receptor, thereby compounding the noise. Noise barriers can provide noise level reductions ranging from approximately 5 dBA (where the barrier just breaks the line-of-sight between the source and receiver) to an upper range of 20 dBA with a larger barrier.[17] Additionally, structures with closed windows can further attenuate exterior noise by a minimum of 20 dBA to 30 dBA.[18]

Receptors located downwind from a noise source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels.[19] Atmospheric temperature inversion (i.e., increasing temperature with elevation) can increase sound levels at long distances. Other factors such as air temperature, humidity, and turbulence can, under the right conditions, also have substantial effects on noise levels.[20]

Vibration Fundamentals

Vibration can be interpreted as energy transmitted in waves through the ground or man-made structures, which generally dissipate with distance from the vibration source. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Since energy is lost during its transfer from one particle to another, vibration becomes less perceptible with increasing distance from the source.

As described in the Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment Manual*, groundborne vibration can be a serious concern for nearby neighbors of a transit

[14] Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.1, September 2013.
[15] Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.1, September 2013.
[16] Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.1, 2013.
[17] Caltrans, TeNS to the Traffic Noise Analysis Protocol, Sections 2.1.4.24 and 5.1.1, September 2013.
[18] Caltrans, TeNS to the Traffic Noise Analysis Protocol, Section 7.4.2, Table 7-1, September 2013.
[19] Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.3, September 2013.
[20] Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.3, September 2013.

system route or maintenance facility, causing buildings to shake and rumbling sounds to be heard.[21] In contrast to airborne noise, groundborne vibration is not a common environmental problem, as it is unusual for vibration from sources such as rubber-tired buses and trucks to be perceptible, even in locations close to major roads. Some common sources of groundborne vibration are trains, heavy trucks traveling on rough roads, and certain construction activities, such as blasting, pile-driving, and operation of heavy earth-moving equipment.[22] Groundborne vibration generated by man-made activities (e.g., road traffic, construction operations) typically weakens with greater horizontal distance from the source of the vibration.

Several different methods are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal in inches per second (in/sec), and is most frequently used to describe vibration impacts to buildings.[23] The root mean square (RMS) amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body.[24] Decibel notation (VdB) is commonly used to express RMS vibration velocity amplitude. The relationship of PPV to RMS velocity is expressed in terms of the "crest factor," defined as the ratio of the PPV amplitude to the RMS amplitude. PPV is typically a factor of 1.7 to 6 times greater than RMS vibration velocity; FTA uses a crest factor of 4. [25] The decibel notation VdB acts to compress the range of numbers required to describe vibration. Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receptors for vibration include buildings where vibration would interfere with operations within the building or cause damage (especially older masonry structures), locations where people sleep, and locations with vibration sensitive equipment.[26]

Groundborne 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.[27] The relationship between groundborne vibration and groundborne noise depends on the frequency of the vibration and the acoustical absorption characteristics of the receiving room. For typical buildings, groundborne vibration that causes low frequency noise (i.e., the vibration spectrum peak is less than 30 Hz) results in a groundborne noise level that is approximately 50 decibels lower than the velocity level. For groundborne vibration that causes mid-frequency noise (i.e., the vibration spectrum peak is between 30 and 60 Hz), the groundborne noise level will be approximately 35 to 37 decibels lower than the velocity level.[28] Therefore, for typical buildings, the groundborne noise decibel level is lower than the groundborne vibration velocity level at low frequencies.

[21] Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, Section 7, 2018.
[22] FTA, Transit Noise and Vibration Impact Assessment Manual, Section 7, 2018.
[23] FTA, Transit Noise and Vibration Impact Assessment Manual, Section 5.1, 2018.
[24] FTA, Transit Noise and Vibration Impact Assessment Manual, Section 5.1, 2018.
[25] FTA, Transit Noise and Vibration Impact Assessment Manual, Section 5.1, 2018.
[26] FTA, Transit Noise and Vibration Impact Assessment Manual, Section 6.1, 6.2, and 6.3, 2018.
[27] FTA, Transit Noise and Vibration Impact Assessment Manual, Section 5.4, 2018.
[28] FTA, Transit Noise and Vibration Impact Assessment Manual, Table 6-3 and Table 6-14, September 2018.

4.7.3 Environmental Setting

Regulatory Framework

Federal, State, and local agencies regulate different aspects of environmental noise. Federal and State agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies. Local regulation of noise involves implementation of general plan policies and noise ordinance standards. Local general plans identify general principles intended to guide and influence development plans; local noise ordinances establish standards and procedures for addressing specific noise sources and activities. Noise issues relevant to the Project are addressed in Title 24 of the California Code of Regulations, City of Inglewood General Plan policies and the City of Inglewood noise ordinance standards.

Federal

Noise Control Act

In 1972, the Noise Control Act (42 United States Code section 4901 et seq.) was passed by congress to promote limited noise environments in support of public health and welfare. It also established the US Environmental Protection Agency (US EPA) Office of Noise Abatement and Control to coordinate federal noise control activities. US EPA established guidelines for noise levels that would be considered safe for community exposure without the risk of adverse health or welfare effects. **Table 4.7-1** presents noise exposure levels highlighted by the guidelines.

TABLE 4.7-1
NOISE LEVELS REQUISITE TO PROTECT PUBLIC HEALTH AND WELFARE WITH AN ADEQUATE MARGIN OF SAFETY

Effect	Level Needed to Avoid Effect	Area
Hearing loss	< 70 dBA[a] (Leq, 24-hour)	All areas.
Outdoor activity interference and annoyance	< 55 dBA (Ldn)	Outdoor residential areas and farms as well as other outdoor areas where people spend varying amounts of time and places where quiet is a basis for use.
Outdoor activity interference and annoyance	< 55 dBA (Leq, 24-hour)	Outdoor areas where people spend limited amounts of time, such as school yards, playgrounds, etc.
Indoor activity interference and annoyance	< 45 dBA (Ldn)	Indoor residential areas.
Indoor activity interference and annoyance	< 45 dBA (Leq, 24-hour)	Other indoor areas with human activities, such as schools, etc.

Note:

a. Yearly average equivalent sound levels in decibels; the exposure period that results in hearing loss at the identified level is 40 years.

Source: US Environmental Protection Agency, 1974. Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. March 1974. p. 4

In a 1974 study, US EPA found that to prevent hearing loss over the lifetime of exposure, the yearly average Leq should not exceed 70 dBA. To prevent interference and annoyance, the US EPA found that the Ldn should not exceed 55 dBA outdoors or 45 dBA indoors.[29] In 1982, noise control was largely passed to State and local governments.

Federal regulations establish noise limits for medium and heavy trucks (more than 4.8 tons, gross vehicle weight rating) under 40 Code of Federal Regulations (CFR), Part 205, Subpart B. The federal truck pass-by noise standard is 80 dBA at 50 feet (approximately 15 meters) from the vehicle pathway centerline under specified test procedures. These requirements are implemented through regulatory controls on truck manufacturers. There are no comparable federal standards for vibration, which tend to be specific to the roadway surface, the vehicle load, and other factors.

Federal Transit Administration

The Federal Transit Administration (FTA) has published guidance for assessing noise and vibration impacts from rail sources.[30] Additionally, this guidance provides methodologies for assessing the potential noise impacts from construction. The FTA's Transit Noise and Vibration Impact Assessment is specifically developed for determining significant noise and vibration impacts for transit projects involving rail or bus facilities, although it is commonly applied to non-rail and non-bus transit projects, and includes noise impact criteria. There are no federal vibration standards or regulations adopted by any agency that are applicable to evaluating vibration impacts from land use development projects such as the Project. However, the FTA has adopted vibration criteria for use in evaluating vibration impacts from construction activities.[31] The vibration damage criteria adopted by the FTA are shown in **Table 4.7-2**.

TABLE 4.7-2
CONSTRUCTION VIBRATION DAMAGE CRITERIA

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

Source: FTA, Transit Noise and Vibration Impact Assessment Manual, 2018

The FTA has also adopted standards associated with human annoyance for determining the groundborne vibration and noise impacts from groundborne noise on the following three off-site land-use categories: Vibration Category 1 – High Sensitivity, Vibration Category 2 – Residential, and Vibration Category 3 – Institutional.[32] The FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal

[29] US Environmental Protection Agency, 1974. *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety.* March 1974. p. 34.

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

[31] FTA, Transit Noise and Vibration Impact Assessment Manual, Table 7-5, page 186, 2018.

[32] FTA, Transit Noise and Vibration Impact Assessment Manual, Table 6-1, page 124, 2018.

optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment but that still potentially involve activities that could be disturbed by vibration. The vibration thresholds associated with human annoyance for these three land use categories are shown in **Table 4.7-3**. No thresholds have been adopted or recommended for commercial or office uses.

TABLE 4.7-3
GROUNDBORNE VIBRATION AND GROUNDBORNE NOISE IMPACT CRITERIA FOR GENERAL ASSESSMENT

Land Use Category	Frequent Events[a]	Occasional Events[b]	Infrequent Events[c]
Category 1: Buildings where vibration would interfere with interior operations.	65 VdB[d]	65 VdB[d]	65 VdB[d]
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB

Notes:
a. "Frequent Events" is defined as more than 70 vibration events of the same source per day.
b. "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.
c. "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day.
d. This criterion is based on levels that are acceptable for most moderately sensitive equipment, such as optical microscopes.

Source: FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018.

Federal Aviation Administration

CFR Part 150, Airport Noise Compatibility Planning, sets forth the methodology and procedures to be followed when preparing aircraft noise exposure maps and developing airport /airport environs land use compatibility programs. CFR Part 150 studies typically consist of two primary components: (1) the Noise Exposure Map (NEM) report, which contains detailed information regarding existing and 5-year future airport/aircraft noise exposure patterns, and (2) the Noise Compatibility Program (NCP), which includes descriptions and an evaluation of noise abatement and noise mitigation options/programs applicable to an airport.[33]

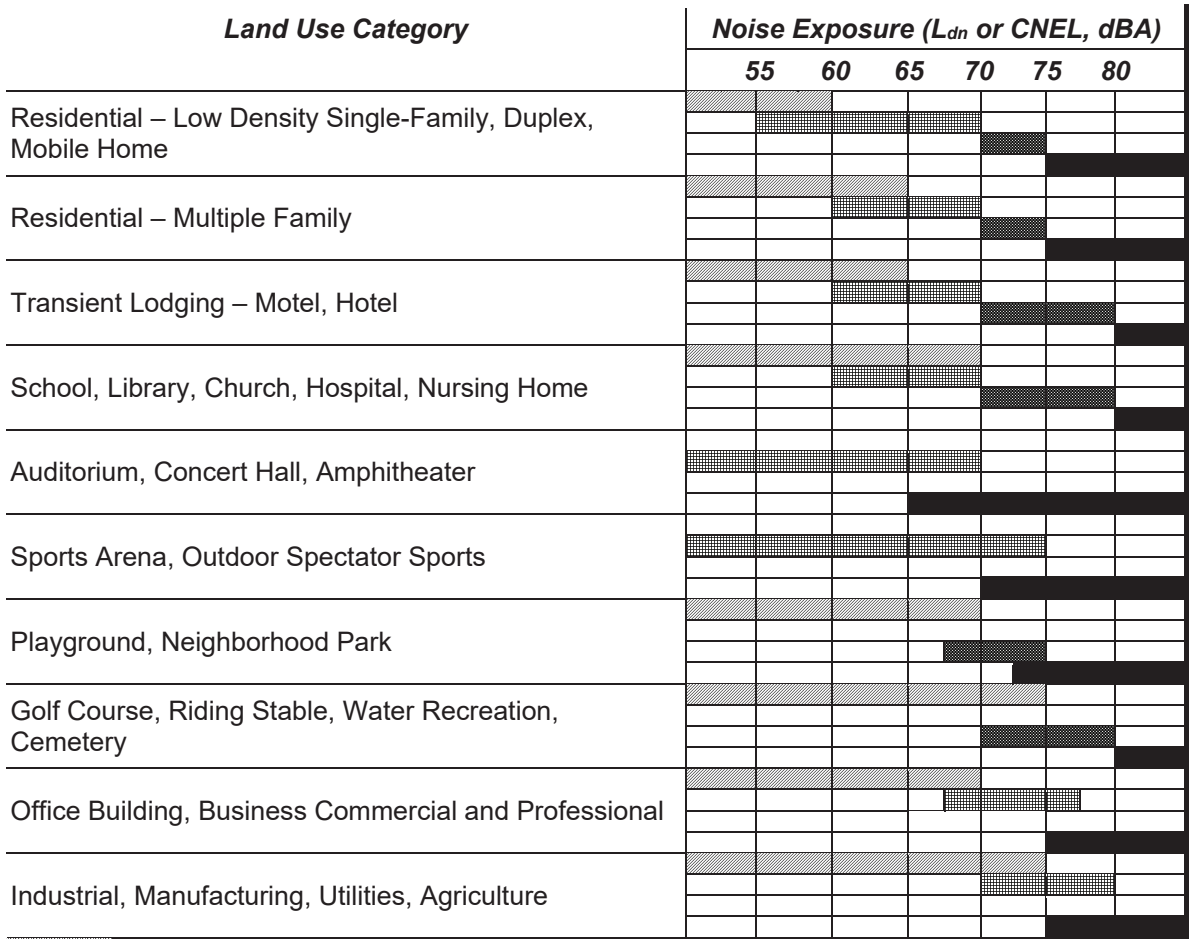
State

Office of Planning and Research Guidelines for Noise Compatible Land Use

The State of California has not adopted Statewide standards for environmental noise, but the Governor's Office of Planning and Research (OPR) has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure, as presented in **Figure 4.7-2**.[34]

[33] City of Los Angeles, Los Angeles World Airports, 2015. Noise Management LAX, LAX Part 150 Noise Exposure Map Update. August 2015.

[34] State of California, Governor's Office of Planning and Research, General Plan 2017 Guidelines, page 377, 2017.



NORMALLY ACCEPTABLE: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

CONDITIONALLY ACCEPTABLE: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design.

NORMALLY UNACCEPTABLE: New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirement must be made and needed noise insulation features included in the design.

CLEARLY UNACCEPTABLE: New construction or development should generally not be undertaken. Construction costs to make the indoor environmental acceptable would be prohibitive and the outdoor environment would not be usable.

Source: State of California, General Plan Guidelines, Governor's Office of Planning and Research, 2003

D202400867.01 - Inglewood High School Reconstruction\05 Graphics-GIS-Modeling-USE AZUREDEIR

Figure 4.7-2
Guidelines for Noise Compatible Land Use
Inglewood High School Reconstruction

The purpose of these guidelines is to maintain acceptable noise levels in a community setting for different land use types. Noise levels are divided into four general categories, which vary in range according to land use type: "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable." The City has developed its own compatibility guidelines in the Noise Element of the General Plan based in part on OPR Guidelines. California Government Code Section 65302 requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(f) requiring a noise element to be included in the general plan. The Noise Element must identify and appraise noise problems in the community and analyze and quantify current and projected noise levels.

The State has also established noise insulation standards for new multi-family residential units, hotels, and motels. These requirements are collectively known as the California Noise Insulation Standards (Title 24 of the California Code of Regulations [CCR]). The noise insulation standards set forth an interior standard of 45 dBA CNEL in any habitable room. The standards require an acoustical analysis demonstrating how dwelling units have been designed to meet this interior standard where such units are proposed in areas subject to exterior noise levels greater than 60 dBA CNEL. Title 24 standards are typically enforced by local jurisdictions through the building permit application process.

Regional

Los Angeles County Airport Land Use Plan

The Project Site is located approximately 1.5 miles east of LAX and approximately 1.5 miles to the north of the HHR. Pursuant to Division 9, Part 1, Chapter 4, Article 3.5, Sections 21670–21679.5 of the California Public Utilities Code, each county in California in which there is an airport served by a scheduled airline and each county with an airport operated for the benefit of the general public, with certain exceptions, is required to establish an airport land use commission (ALUC). Each ALUC must develop a plan for promoting and ensuring compatibility between each airport in the county and surrounding land uses. In Los Angeles County, the Los Angeles County Regional Planning Commission also acts as the ALUC. ALUC's purpose is to coordinate planning for the area around public airports to protect the public health, safety and welfare from land uses that do not minimize the public's exposure to excessive noise and safety hazards. This is achieved through review of proposed development surrounding airports and through policy and guidance provided in the Los Angeles County ALUP, which was adopted on December 19, 1991.[35]

In formulating the Los Angeles County ALUP, the ALUC establishes provisions to ensure safe airport operations, through the delineation of Runway Protections Zones (RPZs) and height restriction boundaries, and to reduce excessive noise exposure to sensitive uses through noise insulation or land reuse. The extent of the planning boundary designated for the airports in the Los Angeles County ALUP is determined by CNEL noise contours. The Los Angeles County ALUP employs a land use compatibility table to identify the level of compatibility for particular land uses within the planning area boundaries/ AIAs for the County's airports based on community noise exposure level. Per the CFR Part 150 Land Use Compatibility Guidelines, residential uses are identified as non-compatible land uses for parcels exposed

[35] Los Angeles County Airport Land Use Commission, 1991. Los Angeles County Airport Land Use Plan, prepared by the Department of Regional Planning, adopted December 19, 1991.

to 65 dBA CNEL or higher.[36] Commercial land uses are identified as compatible with 65 and 70 dBA CNEL noise levels. The CFR Part 150 Land Use Compatibility Guidelines categorizes hotel uses as a transient lodging form of residential.

The Project Site is partially located within the Planning Boundary/Airport Influence Area for the LAX Airport as designated within the Los Angeles County ALUP.

ALUP Policies Related to Noise:

> **Policy N-1:** Use the CNEL method for measuring noise impacts near airports in determining suitability for various types of land uses.
>
> **Policy N-2:** Require sound insulation to insure a maximum interior 45 dBA CNEL in new residential, educational, and health-related uses in areas subject to exterior noise levels of 65 dBA CNEL or greater.
>
> **Policy N-3:** Utilize the Table Listing Land Use Compatibility for Airport Noise Environments in evaluation projects within the planning boundaries.
>
> **Policy N-4:** Encourage local agencies to adopt procedures to ensure that prospective property owners in aircraft noise exposure areas above a current or anticipated 60 dBA CNEL are informed of these noise levels and of any land use restrictions associated with high noise exposure.

Consistency with ALUP policies related to noise is addressed in the discussion under Impact NOISE-3, below.

Local

City of Inglewood General Plan

The City of Inglewood General Plan Noise Element, adopted September 1, 1987, is "a comprehensive program for including noise control in the planning process," and "is a tool for local planners to use in achieving and maintaining compatible land use with environmental noise levels."[37] According to the General Plan, noise-sensitive uses include residential dwellings, schools, churches, and hospitals. **Table 4.7-4** presents the Noise/Land Use Compatibility Matrix from the General Plan Noise Element, adopted in 1987. Noise levels of up to 70 dBA CNEL for single- and multifamily residential use and 65 dBA CNEL for schools, churches, and hospitals are considered "Normally Compatible."

[36] Federal Aviation Administration, Land Use Compatibility and Airports. p.V-10.

[37] City of Inglewood, Noise Element of the General Plan, 1987, p. 2.

TABLE 4.7-4
GENERAL PLAN NOISE ELEMENT NOISE/LAND USE COMPATIBILITY MATRIX

Land Use Categories		Community Noise Equivalent Level (CNEL)						
Categories	**Uses**	**<55**		**60**	**65**	**70**	**75**	**80>**
Residential	Single Family, Duplex, Multiple Family	A	A	B	B	C	D	D
Residential	Mobile Home	A	A	B	C	C	D	D
Commercial Regional, District	Hotel, Motel, Transient Lodging	A	A	B	B	C	C	D
Commercial Regional, Village District, Special	Commercial Retail, Bank, Restaurant, Movie Theatre	A	A	A	A	B	B	C
Commercial Industrial Institutional	Office Building, Research and Development, Professional Offices, City Office Building	A	A	A	B	B	C	D
Commercial Recreation Institutional Civic Center	Amphitheatre, Concert Hall Auditorium, Meeting Hall	B	B	C	C	D	D	D
Commercial Recreation	Children's Amusement Park, Miniature Golf Course, Go-cart Track, Equestrian Center, Sports Club	A	A	A	B	B	D	D
Commercial General, Special Industrial, Institutional	Automobile Service Station, Auto Dealership, Manufacturing, Warehousing, Wholesale, Utilities	A	A	A	A	B	B	B
Institutional General	Hospital, Church, Library Schools Classroom	A	A	B	C	C	D	D
Open Space	Parks	A	A	A	B	C	D	D
Open Space	Golf Course, Cemeteries, Nature Centers, Wildlife Reserves, Wildlife Habitat	A	A	A	A	B	C	C
Agriculture	Agriculture	A	A	A	A	A	A	A

Notes:

* Construction of new residential uses will not be allowed in the 65 dBA CNEL for airport noise.

Interpretation:

Zone A = Clearly Compatible

Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Zone B = Normally Compatible

New construction or development should be undertaken only after detailed analysis of the noise reduction requirements are made and needed noise insulation features in the design are determined. Conventional construction, with closed windows and fresh air supply systems or air conditioning, will normally suffice.

Zone C = Normally Incompatible

New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the design.

Zone D = Clearly Incompatible

New construction or development should generally not be undertaken.

Source: City of Inglewood, 1987. Noise Element of the General Plan. Exhibit 6. Adopted September 1, 1987 per Resolution No. 87-61

The following goals and policies from the City of Inglewood General Plan Noise Element are applicable to the Project:

Goal 1: Provide for the reduction of noise where the noise environment represents a threat to public health and welfare. In those areas where the environment represents a threat to the public health and welfare, it is the objective of the City to reduce environmental hazards to levels consistent with the protection of the public health and welfare.

Goal 3: Protect and maintain those areas having acceptable noise environments. In those areas where a quality environment now exists, it is the objective of the City to prevent degradation of that environment.

Goal 4: Provide sufficient information concerning the community noise levels so that noise can be objectively considered in land use planning decisions. Noise and land use incompatibilities can be avoided for new developments when noise is properly considered in the planning and design of the project. It is the objective of the City to prevent future land use and noise conflicts through the planning process.

Policy 4.2: Incorporate noise considerations into land use planning decisions.

- Ensure acceptable noise levels near schools, hospitals, convalescent homes, and other noise sensitive areas.
- Encourage acoustical design in new construction.

Policy 4.3: Develop measures to control non-transportation noise impacts.

- Evaluate noise generated by construction activities.

Policy 4.4: Reduce noise conflicts at the source.

- Actively support the FAR Part 150 Noise Compatibility Program as described in the "Noise Control and Land Use Compatibility Study, Los Angeles International Airport," (March 1984).

Policy 4.5: Reduce noise conflicts at the receiver.

Policy 4.6: Protect those who live and work in the City from dangerous on-the-job noise exposure.

City of Inglewood Municipal Code

City of Inglewood Municipal Code Chapter 5 (Offenses, Miscellaneous), Article 2 (Noise Regulations), establishes "criteria and standards for the regulation of noise levels within the community."[38] Rather than being adopted to assist the City in guiding land use decisions, like the Noise Element of the General Plan, the City's Noise Regulations are intended to protect "the comfort, repose, health, or peace of residents in the area," and define noise levels that are considered public nuisances and are subject to abatement

[38] City of Inglewood Municipal Code Chapter 5, Article 2, section 5-24.

through the City's exercise of its enforcement authority.[39] Relevant sections of the City's Noise Regulations are presented below for informational purposes.

> Section 5-27 establishes base ambient noise levels within respective times and zones. Where actual noise measurements exceed base ambient noise levels as designated by Section 5-27, the measured noise level shall be employed as the base ambient noise level.[40]
>
> Sections 5-29, 5-30, and 5-31 establish the City's authority to regulate noise that "disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person residing in the area," and identifies maximum lawful noise levels and maximum duration periods that may be generated on residential and non-residential properties.
>
> Section 5-39 of the Code prohibits the operation of any machinery, equipment, device, pump, fan, compressor, air—conditioning apparatus, or similar mechanical devise that would cause the noise level at any property line to exceed the ambient noise level by 5 dBA.
>
> Section 5-41 of the Code prohibits construction or repair work and the operation of any pile driver, pneumatic hammer, derrick, excavation or earth moving equipment, or other construction equipment within a residential zone or within a 500-foot radius of a residential zone between the hours of 8:00 p.m. and 7:00 a.m. unless a permit is obtained from the Permits and Licenses Committee of the City.
>
> Section 5-43 of the Code prohibits the operation of any motor driven vehicle due to the nature of the operation of the vehicle, condition of the vehicle, or modification made to the vehicle, that would generate noise so that a reasonable person is caused discomfort or annoyance.
>
> Section 5-51 of the Code states that the commercial (for the purpose of advertising any business, goods, or services and/or for the purpose of advertising or attracting the attention of the public to or soliciting patronage for any performance, entertainment, exhibition or event) and noncommercial (other than "commercial purpose" including, but not limited to philanthropic, charitable, political, and patriotic purposes) use of sound amplifying equipment shall be subject to the following regulations:
>
> 1. The only sounds permitted shall be either music or human speech, or both.
> 2. The operation of sound amplifying equipment shall only occur between the hours of 8:00 a.m. and 10:00 p.m. each day. No operation of sound amplifying equipment for commercial purposes shall be permitted on Sundays or legal holidays.
> 3. No sound emanating from sound amplifying equipment shall exceed 15 dB(A) above the ambient noise base level as measured at any property line.
> 4. Notwithstanding the provisions of subsection (c) of this section, sound amplifying equipment shall not be operated within 200 feet of churches, schools and hospitals.
> 5. In any event, the volume of sound shall be so controlled that it will not be unreasonably loud, raucous, jarring, disturbing, or a nuisance to persons of normal sensitiveness within the area of audibility.

The City's Noise Regulations guide the exercise of the City's authority in protecting the public health and welfare through enforcement action, while the Noise Element of the General Plan, guides land use decision making in the City. As described further in the analysis below, construction and operation of the

[39] City of Inglewood Municipal Code, Chapter 5, Article 2, Section 5-49.

[40] City of Inglewood Municipal Code, Chapter 5, Article 2, Section 5-27.

Project could be inconsistent with some of the existing City Noise Regulations. The applicant has proposed revisions to Chapter 5, Article 2, and Chapter 12 of the Municipal Code. If approved, the Project would not be inconsistent with the City Noise Regulations.

Existing Conditions

The predominant existing noise source surrounding the Project Site is traffic noise from West Manchester Boulevard, South Grevillea Avenue, West Kelso Street, and air traffic noise from Los Angeles International Airport (LAX). Secondary noise sources include general industrial/commercial-related activities, such as loading area/delivery truck activities, trash compaction, and refuse service activities.

Noise-Sensitive Receptor Locations

Some land uses are considered more sensitive to noise than others due to the amount of noise exposure and the types of activities typically involved at the receptor location. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, and parks are generally more sensitive to noise than commercial and industrial land uses. Existing noise sensitive uses adjacent and near to the Project Site include the following:

- R1: Multi-family residential uses to the north of the Project Site at 116 S Fir Avenue, approximately 200 feet from the Project boundary
- R2: Multi-family residential uses at Pacific Rim Apartments to the east of the Project Site, east of South Grevillea Avenue, located approximately 170 feet from the Project boundary.
- R3: Blood of Jesus Prayer and Deliverance Ministries to the southeast of the Project Site, south of East Kelso Street, located approximately 120 feet from the Project boundary.
- R4: Single-family residential uses to the south of the Project Site south of West Kelso Street, approximately 50 feet from the Project boundary.
- R5: Single-family residential uses adjacent to the southwest of the Project Boundary.
- R6: Multi-family residential uses adjacent to the west of the Project Boundary north of West Olive Street

Future noise-sensitive uses near the Project Site that have been proposed or in-development at the time of preparation of this Draft EIR include the following:

- R2: (Proposed) Future multi-family residential uses to the south of the Pacific Rim Apartments, on the south side of East Nutwood Street where the existing abandoned office exists, located approximately 170 feet from the Project boundary. (The ambient noise environment for this proposed residential use is represented by location R2.)

All other noise sensitive receptors are located at greater distances from the Project Site and would be less impacted by Project noise. Impacts are quantified for the sensitive receptors discussed above and represent the sensitive land uses that would have the maximum potential impacts from on-site Project-related noise.

Vibration-Sensitive Receptor Locations

Typically, groundborne vibration generated by man-made activities (i.e., rail and roadway traffic, operation of mechanical equipment and typical construction equipment) diminishes rapidly with distance from the vibration source. Construction activities, such as the use of bulldozers, would have the greatest effect on vibration-sensitive land uses. Energy is lost during the transfer of energy from one particle to another, and, as a result, vibration becomes less perceptible with increasing distance from the source. With respect to potential structural damage, structures within approximately 100 feet of the Project Site are analyzed to determine if there would be impacts resulting in structural damage. As shown in Table 4.7-2, the structural category/construction type (i.e., reinforced-concrete, engineered concrete, non-engineered timber, building susceptible to damage, and historic buildings) determines the vibration damage criteria for a specific building/structure.[41] The structures in the vicinity of the Project Site range from Category I, which are defined as reinforced-concrete, steel, or timber (no plaster) capable of handling up to 0.5 in/sec PPV of vibration, to Category III, which are defined as non-engineered timber and masonry buildings capable of handling up to 0.2 in/sec PPV of vibration. With respect to human annoyance, sensitive land uses include buildings where use of vibration-sensitive equipment is used (e.g., hospitals, research, and manufacturing), residential land uses and buildings where people normally sleep, schools, churches, and doctor's offices.[42] The following structures were considered in the vibration analysis, which represents the nearest structure to the Project Site that would have the maximum potential groundborne vibration impacts from Project-related vibration sources:[43]

- Category III:
  - R6: Multi-family residential structures to the west of the Project Site, north of W Olive Street, with the structure located approximately 10 feet to the west of the Project boundary.

Ambient Noise Levels

To quantify the existing noise environment, two sets of short-term (15-minute) measurements were conducted at six locations, representing the ambient noise levels at land uses identified as R1 through R6 in **Figure 4.7-3**. A 15-minute measurement is a reasonable duration for sampling ambient noise levels where street traffic is the dominant source, as traffic noise generally does not vary significantly within an hour. Ambient sound measurements were conducted on Tuesday, February 25th, 2025, to characterize the existing noise environment in the Project vicinity. The measurement locations are described below:

- R1: Multi-family residential uses to the north of the Project Site at 116 S Fir Avenue, approximately 200 feet from the Project Boundary
- R2: Multi-family residential uses at Pacific Rim Apartments to the east of the Project Site, east of South Grevillea Avenue, located approximately 170 feet from the Project boundary.

[41] Where the structural category/type of a vibration-sensitive receptor is unclear, the analysis herein utilizes a conservative assumption. For example, although structures where industrial processes take place would generally be constructed of concrete, the threshold for non-engineered timber and masonry has been applied due to the uncertainty of building construction.

[42] FTA, Transit Noise and Vibration Impact Assessment Manual, Table 6-1, September 2018.

[43] For structural damage analyses, distances are measured from the Project's property line to the nearest structure.

- R3: Blood of Jesus Prayer and Deliverance Ministries to the southeast of the Project Site, south of East Kelso Street, located approximately 120 feet from the Project boundary.
- R4: Single-family residential uses to the south of the Project Site south of West Kelso Street, approximately 50 feet from the Project boundary.
- R5: Single-family residential uses adjacent to the southwest of the Project Boundary.
- R6: Multi-family residential uses adjacent to the west of the Project Boundary north of West Olive Street

Noise measurements were conducted using Larson-Davis LxT1 Sound Level Meters (SLM). The Larson-Davis LxT1 SLM is a Type 1 standard instrument as defined in the American National Standard Institute (ANSI) S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The recording microphones were placed at a height of 5 feet above the local grade elevation. The sound level meters were set up to collect the hourly average noise level (L_{eq}).

The results of the ambient sound measurements are summarized in **Table 4.7-5**.

Existing Roadway Noise Levels

To further characterize the Project area's ambient noise environment, CNEL noise levels attributed to existing traffic on local roadways were calculated using a traffic noise prediction model, which was developed based on calculation methodologies provided in the Federal Highway Administration (FHWA) Traffic Noise Model (TNM) Technical Manual,[44] and traffic data provided in the Project's VMT Screening Assessment[45] (see Appendix H of this Draft EIR). The TNM model calculates the average noise level at specific locations based on traffic volumes, average speeds, and site environmental conditions.

Existing roadway noise levels were calculated for 23 roadway segments located in the vicinity of the Project Site. The roadway segments selected for analysis are those expected to be most directly impacted by Project-related traffic, which, for the purpose of this analysis, include the roadways located near and immediately adjacent to the Project Site. These roadways, when compared to roadways located further away from the Project Site, would experience the greatest percentage increase or largest increase in volume from traffic generated by the Project (as distances are increased from the Project Site, traffic is spread out over a greater geographic area and its effects are reduced).

The ambient noise environment in the Project vicinity can be characterized by 24-hour CNEL levels attributable to existing traffic on local roadways. **Table 4.7-6** indicates the calculated CNEL from actual existing traffic volumes on the analyzed roadway segments.

[44] The traffic noise model which was developed based on calculation methodologies provided in the Caltrans TeNS document and traffic data provided in the Project's VMT Screening Assessment provided in Appendix H to this Draft EIR. This methodology, considered an industry standard, allows for the definition of roadway configurations, barrier information (if any), and receiver locations.

[45] LLG, VMT Screening Assessment for Inglewood Highschool, September 2025. Provided in Appendix H of this Draft EIR.



Figure 4.7-3
Noise Monitoring Locations
Inglewood High School Reconstruction

TABLE 4.7-5
SUMMARY OF AMBIENT NOISE MEASUREMENTS

Location	Location	Measured Ambient Daytime Noise Levels, dBA L_{eq}
R1	Located to the north of the Project Site at Inglewood Public Library	61.2
R2	Located to the east of the Project Site at Pacific Rim Apartments	59.6
R3	Located to the southeast of the Project Site at Blood of Jesus Prayer and Deliverance Ministries Park	62.6
R4	Located to the south of the Project Site at the residences along W Kelso Street	69.7
R5	Located to the southeast of the Project Site at 215 West Kelso Street	65.8
R6	Located to the west of the Project Site at 214 West Olive Street	67.0

Source: ESA, 2025

TABLE 4.7-6
PREDICTED EXISTING VEHICULAR TRAFFIC NOISE LEVELS

Roadway Segment	Adjacent Land Use	CNEL (dBA) at Referenced Distances from Roadway[a]
		Existing
Fir Avenue		
n/o Manchester Boulevard	Commercial/Residential	58.5
s/o Kelso Street	Residential	60.2
Grevillea Avenue		
between Manchester Boulevard and Nutwood Street	School/Residential	60.1
between Nutwood Street and Kelso Street	School/Open Space	65.8
s/o Kelso Street	Residential/Commercial	67.3
Inglewood Avenue		
n/o Manchester Boulevard	Residential	59.9
s/o Manchester Boulevard	Residential	60.7
Kelso Street		
between Fir Avenue and Grevillea Avenue	Commercial/Residential	71.5
between Grevillea Avenue and La Brea Avenue	Commercial/Residential	63.2
e/o La Brea Avenue	Commercial	57.5
w/o Fir Avenue	Residential	67.5
La Brea Avenue		
between Manchester Boulevard and Nutwood Street	Commercial	68.9
Between Grevillea Avenue and La Brea Avenue	Commercial	66.8
n/o Manchester Boulevard	Commercial	70.0
s/o Kelso Street	Commercial	68.9
Manchester Boulevard		
between Fir Avenue and Grevillea Avenue	Commercial	69.0
Between Grevillea Avenue and La Brea Avenue	Commercial	70.7

Roadway Segment	Adjacent Land Use	CNEL (dBA) at Referenced Distances from Roadway[a]
		Existing
Between Inglewood Avenue and Fir Avenue	Commercial	69.3
e/o La Brea Avenue	Commercial	65.2
w/o Inglewood Avenue	Commercial	71.3
Nutwood Street		
Between Grevillea Avenue and La Brea Avenue	Commercial/Residential	64.9
e/o La Brea Avenue	Commercial	69.3

Notes: e/o: east of; w/o: west of; n/o: north of; s/o: south of.
a. Calculated based on existing traffic volumes.
Source: ESA, 2025

Ambient Vibration Levels

Groundborne Vibration Levels

Aside from periodic construction work, field observations noted that other sources of groundborne vibration in the Project Site vicinity are primarily limited to heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks, etc.) on local roadways. Trucks traveling at a distance of 50 feet typically generate groundborne vibration velocity levels of 65 VdB (approximately 0.0068 in/sec PPV).[46]

Groundborne Noise Levels

Groundborne noise levels would generally be 20 to 50 decibels lower than the velocity level depending on the frequency level of the source.[47] With a background groundborne vibration level in residential areas of 50 VdB or lower, groundborne noise levels would be approximately 0 to 30 dBA. A bus traveling at a distance of 50 feet would generate groundborne noise levels of approximately 23 to 38 dBA. The approximate level of human perception of groundborne noise is 25 dBA for low frequency vibration (near 30 Hz) and 40 dBA for mid-frequency vibration (near 60 Hz).[48]

4.7.4 Environmental Impacts

Thresholds of Significance

The following thresholds of significance are based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would result in a significant noise or vibration impact would occur if it would result in:

- **Threshold 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;
- **Threshold NOISE-2:** Generation of excessive groundborne vibration or groundborne noise levels; or

46 FTA, Transit Noise and Vibration Impact Assessment Manual, Figure 5-4, September 2018.
47 FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018, p. 146.
48 FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018, p. 120.

- **Threshold 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 expose people residing or working in the project area to excessive noise levels.

Based on the regulatory framework described above, significant impacts would occur if any of the following criteria are met.

Construction

- Noise Criteria (NC)-1: Project construction activities should not occur outside the hours from 7:00 a.m. to 8:00 p.m., Monday through Sunday and all holidays unless a permit is obtained from the Permits and Licenses Committee of the City. (IMC.Section 5-41).
- NC-2: Project construction activities would result in noise levels 5 dBA L_{eq} greater than measured ambient noise levels (see Table 4.7-5) at noise-sensitive receptors.

Operation

- NC-3: For Project-related traffic noise, the Project causes the ambient noise levels measured at the property line of affected uses to increase by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" categories; or the Project causes the ambient noise levels measured at the property line of affected uses to increase by 5 dBA CNEL or more within the "normally acceptable" or "conditionally acceptable" categories.
- NC-4: For Project-related operational on-site (i.e., non-roadway) noise sources such as outdoor building mechanical/electrical equipment or parking facilities increase the ambient noise level (Leq) at noise sensitive uses by 5 dBA Leq.

Groundborne Vibration and Groundborne Noise:

- NC-5: Potential Building Damage – Project construction activities cause groundborne vibration levels to exceed 0.2 inch-per-second PPV at the nearest residential buildings.
- NC-6: Potential Human Annoyance – Project construction activities cause groundborne vibration levels to exceed 75 VdB at nearby residential uses for occasional events.

Methodology

The methodology for evaluating construction and operational noise and vibration is discussed below and the calculation assumptions and results are provided in Appendix G of this Draft EIR.

On-Site Construction Noise

On-site construction noise impacts were evaluated by determining the noise levels generated by the different types of construction activity anticipated, calculating the construction-related noise level at nearby sensitive receptor locations, and comparing these construction-related noise levels to existing ambient noise levels (i.e., noise levels without construction noise) at those receptors. The types of construction equipment used, construction phasing, and construction schedule were provided by the Project's construction representative. As indicated by the construction equipment list, no high-impact pile driving or vibratory pile equipment would be used for Project construction.

Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are being operated concurrently. The Project's estimated construction noise levels were calculated for a scenario in which all pieces of construction equipment would operate simultaneously with the loudest type of equipment located at the construction area nearest to the affected receptors to present a conservative impact analysis. The remaining equipment was assumed to be located at the center of the Project Site. The following steps were undertaken to assess construction-period noise impacts.

1. Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table 4.7-5);
2. Typical noise levels for each type of construction equipment were obtained from the Federal Highway Administration Roadway Construction Noise Model (RCNM);
3. Distances between construction site locations (noise sources) and surrounding sensitive receptors were measured using Project architectural drawings and site plans and Google Earth;
4. The construction noise levels were then calculated for each construction phase using the FHWA RCNM, conservatively, in terms of hourly L_{eq}, for sensitive receptor locations based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance, assuming that all of the equipment for each construction phase would be in use concurrently and that the loudest equipment would be located at the edge of the Project Site closest to the sensitive receptor locations and;
5. Construction noise levels were then compared to the construction noise significance thresholds identified above.

Off-Site Roadway Noise (Construction and Operation)

Roadway noise impacts have been evaluated using the Caltrans Technical Noise Supplement (TeNS) method based on the roadway traffic volume data provided in the VMT Screening Assessment[49] prepared for the Project and included in Appendix H of this Draft EIR. This method allows for the definition of roadway configurations, barrier information (if any), and receiver locations. Roadway noise attributable to Project development was calculated and compared to baseline noise levels that would occur under the "Without Project" condition.

Stationary Point-Source Noise (Operations)

Stationary point-source noise impacts were evaluated by identifying the noise levels generated by outdoor stationary noise sources, such as rooftop mechanical equipment, parking structure, and loading area activity, calculating the hourly L_{eq} noise level from each noise source (incorporating individual usage factor for each equipment) at sensitive receptor property lines, and comparing such noise levels to existing ambient noise levels. More specifically, the following steps were undertaken to calculate outdoor stationary point-source noise impacts:

1. Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table 4.7-5);

[49] Linscott, Law, and Greenspan (LLG), VMT Screening Assessment prepared for the Inglewood High School Reconstruction Project, September 2025. Provided in Appendix H of this Draft EIR.

2. Typical noise levels generated by each type of stationary point-source noise generator including mechanical equipment, loading area, and parking structure operations were obtained from measured noise levels for similar equipment/activities, noise levels published in environmental noise assessment documents for land use development projects or scientific journals, or noise levels from equipment manufacturer specifications;
3. Distances between stationary point-source noise generators and surrounding sensitive receptor locations were measured using Project architectural drawings, Google Earth, and site plans;
4. Stationary point-source noise levels were then calculated for each sensitive receptor location based on the standard point source noise-distance attenuation factor of 6 dBA for each doubling of distance;
5. Noise level increases, if any, were compared to the stationary point-source noise significance thresholds identified above in Section Thresholds of Significance subsection; and
6. Outdoor mechanical equipment is assessed based on the City Municipal Code requirements and measured data, and their impacts on the nearby offsite receptors are determined based on their distance from these receptors. The noise levels determined at the offsite, noise-sensitive receptors are then compared to the stationary source noise significance thresholds identified in the City Municipal Code.

Groundborne Vibration (Construction and Operations)

Groundborne vibration impacts due to the Project's construction activities were evaluated by identifying potential vibration sources (i.e., construction equipment), estimating the vibration levels at the potentially affected receptor, and comparing the Project's activities to the applicable vibration significance thresholds. Vibration levels were calculated based on the FTA published standard vibration velocities for various construction equipment operations.[50] The vibration velocities were calculated based on a point source with standard distance propagation conditions, pursuant to FTA procedures. Construction of the Project would not use impact pile driving methods, and as such, impact pile driving vibration is not included in the construction vibration analysis.

Analysis of Project Impacts

Impact NOISE-1: The Project would have a potentially significant impact on noise if it would result in the generation of a substantial temporary or permanent increase in ambient noise level in the vicinity of the Project in excess of the applicable standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Impact Analysis

On-Site Construction Noise

Noise impacts from construction activities are generally a function of the noise generated by construction equipment, equipment locations, the sensitivity of nearby land uses, and the timing and duration of the noise-generating activities. Project construction is anticipated to commence in the first quarter of 2026 and reopen in January 2028.

[50] FTA, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-4.

The proposed Inglewood High School Reconstruction Project (the "Project") consists of the demolition of the majority of the buildings, the modernization of some of the existing buildings, and the construction of six new buildings on the Inglewood High School campus. New buildings would include Administration and General Classrooms (Building 1), Food Services and Multipurpose Room (MPR) (Building 2), Science Labs and General Classrooms (Building 3), and Student Life (Building 4), CTE Classrooms and General Classrooms (Building 5), CTE and Music Classrooms (Building 6). In addition to the new buildings, the Project includes other improvements to modernize the campus. Recreational components include the demolition and reconstruction of the basketball and tennis courts, a combination softball/football/soccer field at the western edge of campus, and new lighting for the courts and fields. The Project also includes walkways throughout the campus to connect the buildings, landscaping, and seating areas.

Construction sequencing would include demolition; grading/excavation; subterranean work/ concrete structure; building construction; architectural coating; and paving/sitework. Project construction would require the use of mobile heavy equipment with high noise-level characteristics. Individual pieces of construction equipment expected to be used during Project construction could produce maximum noise levels of 75 dBA to 90 dBA at a reference distance of 50 feet from the noise source, as shown in **Table 4.7-7**. These maximum noise levels would occur when equipment is operating under full power conditions. The estimated usage factor for the equipment is also shown in 4.7-6. The usage factors are based on the FHWA's Roadway Construction Noise Model User's Guide.[51]

TABLE 4.7-7
CONSTRUCTION EQUIPMENT NOISE LEVELS

Equipment	Estimated Usage Factor, %	Maximum Noise Level at 50 feet from Equipment, dBA (Lmax)
Aerial Lift	20	75
Air Compressor	40	78
Bore/Drill Rig	20	79
Crane	16	81
Excavator	40	81
Forklift	10	75
Generator Sets	50	81
Off Highway Truck	40	76
Other Equipment	50	85
Pavement Scarafier	50	90
Pumps	50	81
Rough Terrain Forklift	10	75
Rubber Tired Loader	40	79
Skid Steer Loader	40	79
Sweepers/Scrubbers	10	82
Tractor/Loader/Backhoe	40	78

Source: FHWA Roadway Construction Noise Model User's Guide, 2006

[51] Federal Highway Administration, Roadway Construction Noise Model User's Guide, 2006. https://www.gsweventcenter.com/Draft_SEIR_References/2006_01_Roadway_Construction_Noise_Model_User_Guide_FHWA.pdf.

A summary of construction noise impacts at existing nearby sensitive receptors is provided in **Table 4.7-8** with supporting calculations provided in Appendix G of this Draft EIR. As shown in Table 4.7-8, exterior construction noise levels are estimated to reach a maximum of 71.1 dBA L_{eq} at the off-site sensitive receptor location R1, 71.4 dBA L_{eq} at the off-site sensitive receptor locations R2, 75.5 dBA L_{eq} at R3, 81.5 dBA L_{eq} at R4, 77.2 at R5, and 77.1 at R6. Projected construction noise levels would exceed daytime noise thresholds at R1 through R6. It is important to note that a 10 dB reduction was applied to receptors R5 and R6 as an approximately 8-foot wall is located on the west side of the Project site that blocks the line-of-sight to and from the Project site with no visible openings. Impacts would be potentially significant at sensitive receptor locations R1 through R6 before implementation of mitigation measures.

The District would comply with the local construction noise control requirements in Section 5-41 of the Inglewood Municipal Code, which prohibits construction or repair work and the operation of any pile driver, pneumatic hammer, derrick, excavation or earth moving equipment, or other construction equipment within a residential zone or within a 500-foot radius of a residential zone between the hours of 8:00 p.m. and 7:00 a.m. unless a permit is obtained from the Permits and Licenses Committee of the City. Compliance with Section 5-41 would limit construction activities to the daytime period when ambient noise levels tend to be higher and temporary construction noise tends to be less impactful. Nonetheless, as Project construction would result in temporary increases in ambient noise that would meet or exceed the thresholds of significance at nearby noise sensitive receptors, construction noise impacts would be potentially significant, and mitigation measures would be required.

Off-Site Construction Noise

Delivery and haul truck trips would occur throughout the construction period, as shown in **Table 4.7-9**, the addition of 240 vendor truck trips, and 628 worker trips per day (30 vendor trips, and 79 worker trips per peak hour) from the overlap of multiple phases which is during utilities during the 15 acre site improvement, electrical service yard building construction, new building (1,2,3,4,5,6) building construction and architectural coating, and modernization building construction, which would result in a 3.8 dBA CNEL increase over the ambient condition along Kelso Street which would result in a new CNEL value of 61.3 dBA CNEL.

As shown in Table 4.7-4, noise levels are considered “normally acceptable” if they are between 50 dBA 65 dBA CNEL or lower, “conditionally acceptable” if they are between 65 dBA CNEL and 75 dBA CNEL, “normally unacceptable” if they reach 75 dBA CNEL, or “clearly unacceptable” if they are greater than 75 dBA CNEL. Noise increases would not represent an exceedance of the significance threshold of an increase of 3 dBA CNEL to or within the “normally unacceptable” or “clearly unacceptable” categories or an increase by 5 dBA CNEL or more within the “normally acceptable” or “conditionally acceptable” categories. Therefore, noise impacts from off-site construction traffic would be less than significant and no mitigation measures are required.

TABLE 4.7-8
ESTIMATED CONSTRUCTION NOISE LEVELS AT EXISTING OFF-SITE SENSITIVE RECEPTORS

Sensitive Receptor and Development Phase	Construction Phase	R1		R2		R3		R4		R5		R6	
		dBA	Distance from Project Construction to R1 (feet)	dBA	Distance from Project Construction to R2 (feet)	dBA	Distance from Project Construction to R3 (feet)	dBA	Distance from Project Construction to R4 (feet)	dBA	Distance from Project Construction to R5 (feet)	dBA	Distance from Project Construction to R6 (feet)
New Buildings	Building Construction 1-6	62	400 to 550	67	200 to 375	64	225 to 600	65	225 to 450	53	350 to 500	57	200 to 350
	Architectural Coating 1-6	62		67		65		65		53		57	
Modernization	Building Construction	63	250 to 550	60	400 to 650	67	175 to 425	71	225 to 400	49	550 to 800	48	600 to 800
15 Acre Site Wide Improvement	Demolition	68	200 to 1,200	70	175 to 1,100	73	100 to 1,300	78	50 to 1,100	75	25 to 1,200	74	25 to 1050
	Grading	71		71		75		82		77		77	
	Landscaping	71		71		75		82		77		77	
	Utilities	63		65		68		73		69		69	
	Paving	66		68		70		74		70		71	
	Architectural Coating	64		63		68		74		70		70	
Electrical Service Yard or Adult Education Remodel	Building Construction	60	215 to 275	49	900 to 950	49	850 to 900	48	900 to 1050	41	700 to 800	50	175 to 275
Overlapping Phases [a]	(see footnote a)	69.3		71.4		72.2		76.1		69.4		69.7	
Max Noise Level		**71.1**		**71.4**		**75.5**		**81.5**		**77.2**		**77.1**	
Ambient Noise Level		**61.2**		**59.6**		**62.6**		**69.7**		**65.8**		**67.0**	
Threshold (Ambient + 5dB)		**66.2**		**64.6**		**67.6**		**74.7**		**70.8**		**72.0**	
Amount Exceeding Threshold		**4.9**		**6.8**		**7.9**		**6.8**		**6.4**		**5.1**	

Notes:
a. Overlapping phases consist of the following: Utilities, Electrical Service Yard, Building Construction 1,2,3,4,5,6, Architectural Coating 1,2,3,4,5,6, and Modernization Building Construction.
Source: ESA 2025

TABLE 4.7-9
ESTIMATE OF OFF-SITE CONSTRUCTION TRAFFIC NOISE LEVELS

Roadway Segment	Adjacent Land Use	CNEL (dBA) at Referenced Distances from Roadway[a]			
		Existing (A)	Existing with Project Construction (B)	Project Increment (B–A)	Exceed Threshold?
Fir Avenue					
n/o Manchester Boulevard	Commercial/Residential	58.5	61.7	3.3	No
s/o Kelso Street	Residential	60.2	62.6	2.4	No
Grevillea Avenue					
between Manchester Boulevard and Nutwood Street	School/Residential	60.0	63.0	3.0	No
between Nutwood Street and Kelso Street	School/Open Space	65.8	66.8	1.0	No
s/o Kelso Street	Residential/Commercial	67.3	68.0	0.7	No
Inglewood Avenue					
n/o Manchester Boulevard	Residential	59.9	63.3	3.3	No
s/o Manchester Boulevard	Residential	60.7	63.7	3.0	No
Kelso Street					
between Fir Avenue and Grevillea Avenue	Commercial/Residential	71.5	72.0	0.5	No
between Grevillea Avenue and La Brea Avenue	Commercial/Residential	63.2	64.6	1.4	No
e/o La Brea Avenue	Commercial	57.5	61.3	3.8	No
w/o Fir Avenue	Residential	67.5	68.1	0.6	No
La Brea Avenue					
between Manchester Boulevard and Nutwood Street	Commercial	68.9	69.6	0.7	No
Between Grevillea Avenue and La Brea Avenue	Commercial	66.8	67.9	1.1	No
n/o Manchester Boulevard	Commercial	70.0	70.5	0.5	No
s/o Kelso Street	Commercial	69.0	69.6	0.7	No
Manchester Boulevard					
between Fir Avenue and Grevillea Avenue	Commercial	68.9	69.6	0.7	No
Between Grevillea Avenue and La Brea Avenue	Commercial	70.6	71.1	0.5	No
Between Inglewood Avenue and Fir Avenue	Commercial	69.3	69.9	0.6	No
e/o La Brea Avenue	Commercial	65.1	66.6	1.5	No
w/o Inglewood Avenue	Commercial	71.3	71.7	0.4	No
Nutwood Street					
Between Grevillea Avenue and La Brea Avenue	Commercial/Residential	64.9	66.1	1.2	No
e/o La Brea Avenue	Commercial	69.3	69.8	0.5	No

Notes: e/o: east of; w/o: west of; n/o: north of; s/o: south of.

a. Calculated based on existing traffic volumes.

Source: ESA, 2025

On-Site Operational Noise

Fixed Mechanical Equipment

The Project would include new mechanical equipment (e.g., air ventilation equipment), which would be located at the roof level along with new equipment in the electrical yard. The Project would demolish 23 existing on-site buildings that would be replaced by 6 new buildings. The total building floor area of the campus would be slightly reduced by just under 5 percent resulting in slightly less floor area that would require air conditioning. Furthermore, the new buildings would be installed with new HVAC units that meet modern building energy and efficiency standards which would operate more quietly compared to the older existing HVAC units. Thus, noise from the operation of HVAC systems would be similar to or slightly less compared to existing conditions on the Project Site.

The school currently has an amplified sound system that allows for announcements to be heard on the Campus. As discussed in Chapter 3, Project Description, with implementation of the Project, the school would continue to have an amplified sound system would allow for announcements to be heard as necessary throughout the Project Site, similar to existing conditions. Sound would also be used during campus activities. All outdoor sound would be in compliance with the City's noise ordinance.

As noise from fixed mechanical equipment would generally be similar to existing conditions, noise impacts from fixed mechanical equipment would be less than significant.

School Activities

The school year runs from late August through early June; summer school sessions also occur on campus. School hours and the associated bell schedule generally is between 8:30 a.m. to 3:15 p.m. Monday through Friday, with the exception that Tuesday end time is 2:20 p.m. In addition, several after-school clubs and organizations have activities on the campus. The campus does not include competition fields for football, softball, baseball or soccer, and these events occur at other District locations. The Project would not change the frequency of campus activities for clubs and organizations or the frequency or location of competition athletic games and competition events. However, the Project would improve the condition of the existing basketball and tennis courts which would remain in the same general location on the west side of the Campus, although the basketball courts would be moved slightly northward and the tennis courts would be moved southward towards the existing southern parking lot. The Project would maintain the same number of basketball and tennis courts as the existing conditions with six courts each. The Project would improve the condition of the existing practice softball, football, and soccer fields. The fields are also used by students during recess and lunch periods and would continue to be open to students during recess and lunch periods with implementation of the Project. The Project would also allow usage of the upgraded sports facilities to accommodate sports practices, school events, and recreational facilities for public use. Given that the Project would not introduce new activities relative to existing conditions and would not expand the number of basketball and tennis courts, with slight location changes to the basketball and tennis courts, even with occasional use of these upgraded facilities from public use, noise levels from the courts and fields would generally be similar to existing conditions.

As noise from school activities would generally be similar to existing conditions, noise impacts from fixed school activities would be less than significant.

Off-Site Operational Traffic Noise

Impacts Under Existing Traffic Baseline Conditions

Existing roadway noise levels were calculated along various roadway segments near to the Project Site. Roadway noise attributable to Project development was calculated using the traffic noise model previously described and was compared to baseline noise levels that would occur under the "No Project" condition. Project impacts are shown in **Table 4.7-10** with supporting calculation files provided in Appendix G of this Draft EIR.

TABLE 4.7-10
OFFSITE TRAFFIC NOISE IMPACTS – EXISTING PLUS PROJECT CONDITIONS

Roadway Segment	Adjacent Land Use	CNEL (dBA) at Referenced Distances from Roadway[a]		
		Existing	Existing + Project	Difference
Fir Avenue				
n/o Manchester Boulevard	Commercial/Residential	58.5	58.6	0.1
s/o Kelso Street	Residential	60.2	61.0	0.8
Grevillea Avenue				
between Manchester Boulevard and Nutwood Street	School/Residential	60.0	62.4	2.4
between Nutwood Street and Kelso Street	School/Open Space	65.8	65.9	0.1
s/o Kelso Street	Residential/Commercial	67.3	67.4	0.1
Inglewood Avenue				
n/o Manchester Boulevard	Residential	59.9	60.1	0.2
s/o Manchester Boulevard	Residential	60.7	60.7	-
Kelso Street				
between Fir Avenue and Grevillea Avenue	Commercial/Residential	71.5	71.6	0.1
between Grevillea Avenue and La Brea Avenue	Commercial/Residential	63.2	63.3	0.1
e/o La Brea Avenue	Commercial	57.5	57.9	0.4
w/o Fir Avenue	Residential	67.5	67.6	0.1
La Brea Avenue				
between Manchester Boulevard and Nutwood Street	Commercial	68.8	69.0	0.2
between Grevillea Avenue and La Brea Avenue	Commercial	66.8	67.0	0.2
n/o Manchester Boulevard	Commercial	69.9	70.0	0.1
s/o Kelso Street	Commercial	68.9	69.0	0.1
Manchester Boulevard				
between Fir Avenue and Grevillea Avenue	Commercial	69.0	69.1	0.1
between Grevillea Avenue and La Brea Avenue	Commercial	70.7	70.7	-
between Inglewood Avenue and Fir Avenue	Commercial	69.2	69.3	0.1
e/o La Brea Avenue	Commercial	65.2	65.7	0.5
w/o Inglewood Avenue	Commercial	71.3	71.3	-

Roadway Segment	Adjacent Land Use	CNEL (dBA) at Referenced Distances from Roadway[a]		
		Existing	Existing + Project	Difference
Nutwood Street				
between Grevillea Avenue and La Brea Avenue	Commercial/Residential	65.0	65.1	0.1
e/o La Brea Avenue	Commercial	69.4	69.4	-

Notes: e/o: east of; w/o: west of; n/o: north of; s/o: south of.

a. Calculated based on existing traffic volumes.

Source: ESA, 2025

As indicated, the maximum increase in Project-related traffic noise levels over existing traffic noise levels would be 2.4 dBA CNEL, which would occur along Grevillea Avenue between Manchester Boulevard and Nutwood Street. This increase in noise level would be below a "clearly noticeable" increase of 3 dBA CNEL which is the threshold set for areas that are conditionally unacceptable or clearly unacceptable. However, this roadway segment is currently not at those levels and it would not exceed the 5 dBA CNEL threshold for an area characterized by normally acceptable or clearly acceptable noise levels, nor would the 3.5 dBA CNEL increase push noise levels into conditionally unacceptable or clearly unacceptable noise levels. The increase in sound level would be lower at the remaining roadway segments analyzed. Therefore, Project-related noise increases would be less than significant, and no mitigation is required.

Mitigation Measures

As analyzed above, the Project's on-site construction activities would result in significant noise impacts without the implementation of mitigation measures. Therefore, the following noise mitigation measures are recommended to reduce the Project's construction-related noise impacts to sensitive uses in the vicinity of the Project Site:

> **MM-NOI-1:** The District and/or its contractor shall implement the following features during Project construction:
>
> - The contractor shall maintain all construction tools and equipment in good operating order according to manufacturers' specifications.
> - The contractor shall equip internal combustion engines with properly operating or improved mufflers over factory that are free from rust, holes, and leaks. For construction equipment that utilize internal combustion engines, the contractor shall ensure the engine's housing doors are kept closed, and shall install noise-insulating material mounted on the engine housing consistent with manufacturers' guidelines, if required to achieve the required 8 dBA noise reduction. The combined use of improved mufflers, closed engine housing doors, and noise-insulating material mounted on the engine housing (if required) shall achieve a minimum noise reduction of 8 dBA, which shall be documented in equipment specification sheets.
> - As an option, in lieu of installing improved mufflers, closed engine housing doors, and/or noise-insulating material mounted on the equipment engine housing, the contractor may install temporary noise barriers along the Project Site boundary. The temporary noise barriers shall be a minimum of 8 feet tall along the eastern and southern boundaries and a minimum of 6 feet tall along the northern boundary of the Project Site. The temporary noise barriers shall be composed of solid material such as plywood or similar and shall block the line-of-sight from construction activities occurring on the Project Site to the residential, church, and open space

park uses to the south, southeast, and east of the Project Site. As an option, in lieu of installing improved mufflers, closed engine housing doors, and/or noise-insulating material mounted on the equipment engine housing, noise absorbing material rated to achieve a minimum 8 dBA reduction in noise may be applied to the existing wall on the west side of the Project site. If the contractor selects to use temporary noise barriers or noise absorbing material, they shall be installed prior to noise-generating construction activities occurring within approximately 200 feet of the eastern, western, northern and/or southern Project Site boundaries.

Level of Significance After Mitigation

Construction Noise

Implementation of Mitigation Measure MM-NOI-1 would reduce the Project's on-site construction noise impacts at the off-site ground-level noise sensitive receptors, to the extent technically feasible.[52] **Table 4.7-11** presents the estimated, conservative construction noise levels at the off-site receptor locations with implementation of the mitigation measure. As indicated in Table 4.7-11, the construction noise levels at all noise-sensitive receptor locations would be reduced to below the significance threshold. MM-NOI-1 would be implemented, which reduces noise levels by a minimum of 8 dBA with the usage of improved mufflers. A study prepared for the U.S. Department of Transportation found that in cases where a particular piece of equipment either does not have or has a very poor muffler, the application of a good muffler will reduce the overall noise by 6 to 12 dBA.[53] Mitigation Measures in MM-NOI-1 specifies an 8 dBA minimum reduction. If the contractor optionally chooses to utilize temporary noise barriers or attaching noise absorbing material to the existing wall on the west side of the Project site, the 8 dBA minimum reduction in noise would also be satisfied due to blocking the line-of-sight to the sensitive receptor and/or absorbing the requisite sound energy. Therefore**,** with implementation of Mitigation Measures in MM-NOI-1, a minimum 8 dBA reduction would apply to the surrounding receptors and impacts from on-site construction noise would be less than significant.

Impact NOISE-2: The Project would have a potentially significant impact on noise if it would result in the generation of excessive groundborne vibration or groundborne noise levels.

Impact Analysis

Structural Damage

Construction

Construction activities can generate varying degrees of groundborne vibration, depending on the construction procedures and the construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibration

[52] Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment. LAMC Chapter XI, Art. 1, Section 112.05.

[53] Toth, William J. 1979, August. "Noise Abatement Techniques for Construction Equipment." Prepared for the National Highway Traffic Safety Administration. US Department of Transportation.

from construction activities rarely reaches levels that damage structures. The Caltrans guidance manual incorporates FTA standard vibration velocities for construction equipment operations (Table 18 of the Caltrans guidance manual). The PPV vibration velocities for the types of construction equipment that can generate perceptible vibration levels and that would be used for the Project are listed in **Table 4.7-12**.

Because vibration level in RMS is best for characterizing human response to building vibration and vibration level in PPV is best used to characterize potential for damage, this construction vibration impact analysis assessed the potential for building damages using vibration levels in PPV (inch/sec). Potential human annoyance is assessed in the next subsection using vibration levels in VdB.

Because groundborne vibration impacts occur normally at or within buildings, the distance to the nearest sensitive uses, for vibration impact analysis purposes, is measured between the nearest off-site sensitive use buildings and the Project construction equipment area near the Project boundary. The Project would require a large bulldozer for the demolition of existing structures. As shown in Table 4.7-12, a large bulldozer generate approximately 0.089 in/sec PPV when measured at 25 feet. As shown in Table 4.7-2, the FTA guidelines indicate that a vibration level of 0.5 inch/sec PPV is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For a non-engineered timber and masonry building, the construction vibration damage criterion is 0.2 inch/sec PPV.

Based on the vibration data provided in Table 4.7-12, vibration velocities from construction equipment would range from approximately 0.003 to 0.089 inches per second PPV at 25 feet from the source of activity. The nearest off-site buildings to the Project Site that could be subjected to Project-related vibration structural damage include the residences to the west (10 feet) as measured from the Project Site boundary. Pile driving would not be used at the Project Site boundary and other vibration-generating equipment would normally operate at least 50 feet or more from the nearest off-site buildings. Thus, based on the vibration data provided in Table 4.7-12, the nearest off-site buildings would be exposed to vibration levels that would cause structural damage and impacts would be potentially significant and mitigation would be required.

Operation

The Project's operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area. Groundborne vibration generated by each of the above-mentioned activities would generate approximately up to 0.005 in/sec PPV adjacent to the Project Site.[54] The potential vibration levels from all Project operational sources at the closest existing sensitive receptor locations would be less than the significance threshold of 0.2 in/sec PPV significance threshold for potential residential building damage. As such, vibration impacts associated with operation of the Project would be below the significance threshold and impacts would be less than significant.

[54] This vibration estimate is based on data presented in the USDOT Federal Transit Administration, 2018; which is included in Appendix G of this Draft EIR.

TABLE 4.7-11
ESTIMATED MITIGATED CONSTRUCTION NOISE LEVELS AT EXISTING OFF-SITE SENSITIVE RECEPTORS

Sensitive Receptor and Development Phase	Construction Phase	R1		R2		R3		R4		R5		R6	
		dBA	Distance from Project Construction to R1 (feet)	dBA	Distance from Project Construction to R2 (feet)	dBA	Distance from Project Construction to R3 (feet)	dBA	Distance from Project Construction to R4 (feet)	dBA	Distance from Project Construction to R5 (feet)	dBA	Distance from Project Construction to R6 (feet)
New Buildings	Building Construction 1,2,3,4,5,6	54	400 to 550	59	200 to 375	56	225 to 600	57	225 to 450	45	350 to 500	49	200 to 350
	Architectural Coating 1,2,3,4,5,6	54		59		57		57		45		49	
Modernization	Building Construction	55	250 to 550	52	400 to 650	59	175 to 425	63	225 to 400	41	550 to 800	40	600 to 800
15 Acre Site Wide Improvement	Demolition	60	200 to 1,200	62	175 to 1,100	65	100 to 1,300	70	50 to 1,100	67	25 to 1,200	66	25 to 1050
	Grading	63		63		67		74		69		69	
	Landscaping	63		63		67		74		69		69	
	Utilities	55		57		60		65		61		61	
	Paving	58		60		62		66		62		63	
	Architectural Coating	56		55		60		66		62		62	
Electrical Service Yard or Adult Education Remodel	Building Construction	52	215 to 275	41	900 to 950	41	850 to 900	40	900 to 1050	33	700 to 800	42	175 to 275
Overlapping Phases [a]	(see footnote a)	**61.3**		**63.4**		**64.2**		**68.1**		**61.4**		**61.7**	
Max Noise Level		**63.1**		**63.4**		**67.5**		**73.5**		**69.2**		**69.1**	
Ambient Noise Level		**61.2**		**59.6**		**62.6**		**69.7**		**65.8**		**67.0**	
Threshold (Ambient + 5dB)		**66.2**		**64.6**		**67.6**		**74.7**		**70.8**		**72.0**	

Notes:

a. Overlapping phases consist of the following: Utilities, and Electrical Service Yard, and Building Construction 1,2,3,4,5,6, and Architectural Coating 1,2,3,4,5,6, and Modernization Building Construction.

Source: ESA 2025

TABLE 4.7-12
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

	Approximate PPV (in/sec)						Approximate RMS (VdB)					
Equipment	10 Feet	25 Feet	50 Feet	75 Feet	100 Feet	150 Feet	10 Feet	25 Feet	50 Feet	75 Feet	100 Feet	150 Feet
Large Bulldozer	0.352	0.089	0.031	0.017	0.011	0.006	95	87	81	77	75	71
Loaded Trucks	0.300	0.076	0.027	0.015	0.010	0.005	94	86	80	76	74	70
Wheel Loader	0.300	0.076	0.027	0.015	0.010	0.005	94	86	80	76	74	70
Fork Lift	0.186	0.047	0.016	0.009	0.006	0.003	89	81	72	67	63	65
Jackhammer	0.138	0.035	0.012	0.007	0.004	0.002	87	79	70	65	61	63
Earth Mover	0.043	0.011	0.004	0.002	0.001	0.001	77	69	60	55	51	53
Small Bulldozer	0.0119	0.003	0.001	0.0006	0.0004	0.0002	66	58	49	48	46	42

Source: FTA, Transit Noise and Vibration Impact Assessment, September 2018; ESA, 2025

Human Annoyance

Construction

The CEQA Thresholds Guide identifies residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, and parks as sensitive uses. Off-site non-residential uses such as retail and commercial uses are not considered vibration sensitive receptors for human annoyance under CEQA. Groundborne noise specifically refers to the rumbling noise emanating from the motion of building room surfaces due to vibration of floors and walls and is perceptible only inside buildings.[55] For typical buildings, groundborne vibration results in groundborne noise levels approximately 25 to 40 decibels lower than the velocity level.[56] According the FTA *Noise and Vibration Manual*, most of the studies of groundborne vibration in this country have focused on urban rail transit and the problems with groundborne vibration and noise that are common when there is less than 50 feet between a subway structure and building foundations. Project construction would not create on-going and continuous groundborne vibration and noise like that of an urban rail transit system. Groundborne noise impacts would also be less than significant.

Nearby vibration-sensitive uses for potential human annoyance in the Project vicinity include the residences approximately 10 feet to the west of the Project Site, with other residential structures at greater distances. At a distance of 10 feet or more, the maximum vibration level would be 95 VdB to 66 VdB or less.

The Project would generate occasional transient vibrations from period construction and not generate continuous vibrations. Thus, Project construction would exceed the FTA's 75 VdB threshold for occasional events at the nearest noise-sensitive receiver locations during daytime hours. In addition, construction vibration-generation activities would not occur during the nighttime hours when people

[55] Federal Transit Administration, Noise and Vibration Manual, 2018, Page 112,

[56] Federal Transit Administration, Noise and Vibration Manual, 2018, Page 119.

normally sleep. However, the Project would still exceed the FTA's 75 VdB threshold for occasional events at residential receivers. Impacts would be potentially significant and mitigation would be required.

Operation

Post-construction on-site activities would be limited to institutional uses, and associated mechanical equipment such HVAC units that would not be anticipated to generate excessive groundborne noise or vibration. Project operational vibration levels would be substantially less than during construction. As such, groundborne vibration and noise impact to human annoyance associated with the long-term operation of project would be less than significant.

Mitigation Measures

MM-NOI-2: For demolition, grading, and building construction activities occurring within 20 feet or less from off-site residential buildings or on-site existing buildings that will be retained and remodeled as part of the Project, construction vibration monitoring shall be conducted to document conditions of the buildings prior to, during, and after groundborne vibration-generating demolition, grading, and building construction activities. The construction vibration monitoring shall be implemented by an architect meeting the Secretary of the Interior's Professional Qualification Standards. The architect shall conduct the following tasks:

- Identify the Project's demolition, grading, and building construction activities occurring and heavy-duty equipment in use within 20 feet or less from off-site residential buildings or on-site existing buildings that will be retained and remodeled as part of the Project that have the potential to generate groundborne vibration;
- Perform a photo survey, elevation survey, and tile/crack monitoring survey for the residential structures and on-site structures within the school located within 20 feet of vibration-generating Project construction activities. Surveys shall be performed prior to and in regular intervals (i.e., at least weekly) during of all vibration-generating activities within 20 feet or less of the structures on-site.
- Conduct a post-construction survey on the structures following the completion of vibration-generating activities occurring within 20 feet of the structures. The applicant shall be required to make appropriate repairs in accordance with the Secretary of the Interior's Standards where damage has occurred as a result of construction activities as identified by the architect.

MM-NOI-3: Within 100 feet of an occupied structure where human annoyance may be perceptible (e.g. residences), the contractor shall schedule construction activities during less sensitive daytime hours of 8:00 a.m. to 5:00 p.m. to avoid annoyance impacts. The contractor shall also use alternative equipment with less horsepower (i.e., 100 horsepower or less) if such equipment is commercially available (i.e., can be obtained from a vendor within the greater Los Angeles area) and can perform the required work within a similar duration.

Level of Significance After Mitigation

Implementation of MM NOI-2 would reduce the Project's potential construction groundborne vibration structural damage impacts at nearby off-campus structures to less than significant. In addition, implementation of MM NOI-2, would reduce potential structural damage impacts to on-campus structures to less than significant. Implementation of MM NOI-2 would ensure that any inadvertent damage to the structures and its features on campus or at off-site sensitive receptors resulting from Project groundborne vibration would be replaced and/or repaired to applicable standards.

Implementation of MM NOI-3 would limit the Project's groundborne vibration activities occurring within 100 feet of sensitive residential uses to less sensitive daytime hours. Therefore, potential structural damage and human annoyance vibration impacts would be reduced to less than significant levels.

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 expose people residing or working in the project area to excessive noise levels.

The Project Site is not located within the vicinity of a private airstrip; however, the Project Site is located within the Airport Influence Area, of the Los Angeles International Airport Land Use Compatibility Plan (ALUCP) and is located within the Noise Contours Map. The Project Site is located approximately 1.5-mile northeast of the Los Angeles International Airport, just outside the 65 dBA CNEL noise exposure contour of the Airport Influence Area (AIA). According to the Airport Land Use Plan for the Los Angeles International Airport, the Project Site would be conditionally compatible with the ALUP as school uses are normally acceptable within the exterior exposure noise contour range of 65 dBA CNEL or less (Los Angeles International Airport 2015).Therefore, the Proposed Project would not expose people residing or working in the Proposed Project area to excessive noise levels within the vicinity of a private or public airport. Impacts would be less than significant.

Cumulative Impacts

The geographic context for the analysis of cumulative noise impacts depends on the impact being analyzed. Noise is by definition a localized phenomenon, and significantly reduces in magnitude as the distance from the source increases. Noise would normally affect the areas immediately adjacent to the source, specifically areas that are less than 500 feet. On-site cumulative noise impacts could occur at receptor locations that are within 500 feet from two different sources. Therefore, based on a 500-foot screening distance, the on-site cumulative noise impacts analysis is limited to related projects within 1,000 feet of the Project Site. The 1,000-foot distance is based on an assumption that a noise-sensitive receptor would be located halfway between the Project Site and the related project. However, the cumulative impacts on roadway noise would be affected by traffic from all cumulative projects throughout a larger vicinity.

As discussed in Chapter 2, *Environmental Setting,* of this Draft EIR, there are eleven related projects identified in the vicinity of the Project Site. The related projects within approximately 1,000 feet of the Project Site are listed in **Table 4.7-13**.

TABLE 4.7-13
RELATED PROJECTS WITHIN 1,000 FEET OF THE PROJECT SITE

No.	Location	Land Use	Size	Unit	Distance to Project Site (ft)
2	101, 125, 139, 140, 150 Market Street	Residential	50	DU	950
		Retail	40,000	SF	
5	419 S. Eucalyptus Avenue	Residential	6	DU	550
6	315 W. Queen Street	Residential	21	DU	875

Notes: Sf = square feet, DU = dwelling units.
Source: LLG, 2025

Construction Noise

On-Site Construction Noise

Three of the related projects (Related Project Nos. 2,5, and 6) are located within approximately 1,000 feet of the Project Site and could contribute to cumulative construction noise impacts from on-site construction activities to off-site sensitive receptors if they are under construction at the same time as the Project. According to CEQA Guidelines Section 15300.2(b), cumulative impacts may occur if the impact of successive projects of the same type in the same place, over time is significant. Noise from the construction of development projects is generally localized to the immediate area of the project site and typically has the potential to affect noise-sensitive uses within 500 to 1,000 feet from the construction site, due to the effect of noise attenuation from increasing distance away from a site. As discussed above, the Project would result in a less than significant impact for construction with MM-NOISE-1. Construction of Related Project Nos. 2,5, and 6 would be required to comply with the noise standards and ordinances of the City of Inglewood, as applicable. Although Related Project Nos. 2 and 6 are located further away, they would still actively contribute to an ambient noise level increase at surrounding sensitive receptors. The noise contributions would be less given the intervening buildings and further distance. Related Project No. 5 is the closest related project to the Proposed Project, but is the smallest in size and would not be likely to create a significant noise impact. Similar to the other related projects, intervening buildings, topography, and distance would reduce noise levels at the analyzed sensitive receptors by the Project from construction noise from Related Project No. 5. The provided Mitigation Measures MM-NOISE-1 reduced noise levels to acceptable noise increases at surrounding sensitive receptors from construction noise from the Project only. Given the proximity of all related projects to the Project Site and the analyzed sensitive receptors and intervening buildings and topography, if the related projects are actively constructed at the same time as the Project, noise increases from the combined activities would be unlikely to exceed the ambient plus 5 dBA threshold from construction noise under a cumulative setting, resulting in a less than significant impact.

Off-Site Construction Noise

With regard to off-site construction noise, construction traffic from all related projects would contribute to noise levels on major thoroughfares throughout the region, although the related projects are located in different areas and, to some extent, would have varied haul routes and traffic patterns associated with their construction. As shown in Table 4.7-9, the Project would not result in any significant off-site construction noise impacts due to construction trips.

If related projects contribute to an increase in construction vehicle trips along the same roadway segments and at the same time as the Project, the cumulative increase in construction traffic noise would be greater and could exceed the lowest significance threshold of 3 dBA Leq. While exact construction schedules and construction truck trips for these related projects are not known, it can be assumed that construction of the related projects could occur at the same time as the Project and would include less worker, vendor, and haul trips than the Project as they are all much smaller in scope. Therefore, it would be unlikely for the related projects to exceed the thresholds along adjacent local roadways to the Project and thus it would be unlikely for off-site construction noise from the Project to result in a cumulative off-site construction noise impact with the incorporation of the related projects. Impacts would be less than significant.

Operation Noise

On-Site Operational Noise

City of Inglewood has provisions that limit stationary-source noise from items such as roof-top mechanical equipment that would ensure noise levels would be less than significant at the property line for each related project. Further, noise from other stationary sources would be limited to areas in the immediate vicinity of each related project. With the noise attenuation of 6 dBA per doubling of distance from the noise source, receivers outside of a distance of 200 feet from any noise source would receive a 12 dBA noise reduction compared to the noise level received at 50 feet from that noise source. Although each related project could potentially impact an adjacent sensitive use in its own vicinity, that potential impact would be localized to that specific area and would not contribute to cumulative noise conditions at or adjacent to the Project Site, which is more than 200 feet from other related projects. As the Project's stationary-source impacts would be less than significant, the Project's cumulative on-site stationary-source noise impacts would be less than significant.

Off-Site Operational Noise

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to operation of the Project and related projects, as traffic is the greatest source of operational noise in the Project area. Cumulative traffic-generated noise impacts were assessed based on a comparison of the future cumulative base traffic volumes with the Project to the future base traffic volumes without the Project. The noise levels associated with future base traffic volumes without the Project, and future year base traffic volumes with the Project are provided in **Table 4.7-14**.

Table 4.7-14 shows the Project's contribution to the cumulative noise levels during the buildout year of 2028. The maximum cumulative noise increase from the Project plus cumulative project traffic would be 2.2, which would occur along Grevillea Avenue between Manchester Boulevard and Nutwood Street. This increase in sound level would be below a 3 dBA increase in areas within "normally unacceptable" zone or a 5 dBA increase in areas within a "normally acceptable" zone, and the increase in sound level would be lower at the remaining roadway segments analyzed. The Project-related noise increases contribution to the cumulative traffic noise impacts would be less than significant, and no mitigation measures would be required.

Construction Groundborne Vibration

On-Site Construction Vibration

Due to rapid attenuation characteristics of groundborne vibration, only related projects located adjacent to the same sensitive receptors would result in cumulatively considerable vibration impacts. None of the related projects are located adjacent to the sensitive receptors identified for the Project. Vibration attenuates at high rates with distance. Therefore, construction vibration would only affect sensitive uses located directly adjacent to the Project and related projects. Therefore, construction of the Project, when considered together with the related projects, would not result in a cumulatively considerable contribution and would have a less-than-significant cumulative impact with regard to on-site groundborne vibration (structural damage and human annoyance).

TABLE 4.7-14
OFFSITE TRAFFIC NOISE IMPACTS – FUTURE PLUS PROJECT CONDITIONS

Roadway Segment	Adjacent Land Use	CNEL (dBA) at Referenced Distances from Roadway[a]		
		Future	Future + Project	Difference
Fir Avenue				
n/o Manchester Boulevard	Commercial/Residential	58.5	58.8	0.3
s/o Kelso Street	Residential	60.5	61.3	0.8
Grevillea Avenue				
between Manchester Boulevard and Nutwood Street	School/Residential	60.4	62.6	2.2
between Nutwood Street and Kelso Street	School/Open Space	66.1	66.2	0.1
s/o Kelso Street	Residential/Commercial	67.8	67.9	0.1
Inglewood Avenue				
n/o Manchester Boulevard	Residential	60.1	60.3	0.2
s/o Manchester Boulevard	Residential	60.9	60.9	-
Kelso Street				
between Fir Avenue and Grevillea Avenue	Commercial/Residential	71.8	71.8	-
between Grevillea Avenue and La Brea Avenue	Commercial/Residential	63.5	63.6	0.1
e/o La Brea Avenue	Commercial	57.9	58.2	0.3
w/o Fir Avenue	Residential	67.8	67.9	0.1
La Brea Avenue				
between Manchester Boulevard and Nutwood Street	Commercial	69.6	69.7	0.1
between Grevillea Avenue and La Brea Avenue	Commercial	67.4	67.6	0.2
n/o Manchester Boulevard	Commercial	70.3	70.4	0.1
s/o Kelso Street	Commercial	69.2	69.4	0.2
Manchester Boulevard				
between Fir Avenue and Grevillea Avenue	Commercial	69.2	69.3	0.1
between Grevillea Avenue and La Brea Avenue	Commercial	70.9	71.0	0.1
between Inglewood Avenue and Fir Avenue	Commercial	69.6	69.6	-
e/o La Brea Avenue	Commercial	66.1	66.5	0.4
w/o Inglewood Avenue	Commercial	71.6	71.7	0.1
Nutwood Street				
between Grevillea Avenue and La Brea Avenue	Commercial/Residential	65.5	65.6	0.1
e/o La Brea Avenue	Commercial	69.5	69.6	0.1

Notes: e/o: east of; w/o: west of; n/o: north of; s/o: south of.

a. Calculated based on existing traffic volumes.

Source: ESA, 2025

Off-Site Construction Vibration

Due to rapid attenuation characteristics of groundborne vibration, only related projects located adjacent to the same sensitive receptors would result in cumulatively considerable vibration impacts. It is unusual for groundborne vibration from sources such as rubber-tired trucks to be perceptible, even in locations close to major roads, unless the road surface is rough with uneven spaces. Several related projects are in locations that could potentially lead construction traffic, including truck traffic near sensitive vibration receptors. Should construction of the Project and related projects overlap, there is a potential for cumulative vibration impacts to sensitive vibration receptors. As discussed above, construction of the Project, both on-site and off-site, would not result in significant vibration impacts related to structural damage or human annoyance. Therefore, cumulative off-site construction vibration impacts would be less than significant.

Operational Groundborne Vibration

Due to the rapid attenuation characteristics of groundborne vibration and distance from each of the related projects to the Project Site, there is no potential for cumulative operational impacts with respect to groundborne vibration. As such, the Project's contribution to impacts related to groundborne vibration during operation would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

On-Site Construction Noise

Not Applicable. Cumulative impacts regarding on-site construction noise would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Off-Site Construction Noise

Not Applicable. Cumulative impacts regarding off-site construction noise would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

On-Site Operational Noise

Not Applicable. Cumulative impacts regarding operational noise would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Off-Site Operational Noise

Not Applicable. Cumulative impacts regarding off-site operational noise would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Construction Groundborne Vibration

Not Applicable. Cumulative impacts regarding off-site construction groundborne vibration would be less than significant without mitigation.

Operational Groundborne Vibration

Not Applicable. Cumulative impacts regarding operational groundborne vibration would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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4.8 Transportation

4.8.1 Introduction

This section analyzes potential impacts related to transportation. The analysis is based on the Vehicle Miles Traveled (VMT) Screening Assessment for the Project prepared by LLG Consulting, Inc, dated September 18, 2025, included as Appendix H of this Draft EIR. The Transportation Study was prepared in accordance with the City of Inglewood's (City) Transportation Impact Analysis (TIA) Guidelines.

4.8.2 Environmental Setting

Regulatory Framework

Federal

Americans with Disabilities Act of 1990

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

State

Complete Streets Act

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

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

Assembly Bill 32 and Senate Bill 375

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

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

There are five major components to SB 375. First, regional GHG emissions targets: California ARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 andc2035 for each Metropolitan Planning Organization (MPO) in the State. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements.

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

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on 8-year schedules. In addition, Regional Housing Needs Assessment (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years.

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

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

California Vehicle Code

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

Senate Bill No. 743

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic level of service (LOS). This started a process that changes transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not

considered significant impacts on the environment. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

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

Based on these changes, the City of Inglewood adopted Transportation Impact Analysis (TIA) Guidelines in 2022 to establish the City's CEQA transportation thresholds of significance and to provide methodologies, screening criteria, and evaluation procedures for determining project-related VMT impacts in accordance with SB 743.

CEQA Guidelines Section 15064.3

As discussed above, the City of Inglewood has adopted transportation analysis procedures consistent with CEQA Guidelines Section 15064.3, which establish Vehicle Miles Traveled (VMT) as the most appropriate measure of transportation impacts. Under the City's Transportation Impact Analysis (TIA) Guidelines, projects are evaluated based on per-capita or per-employee VMT relative to citywide or regional averages. Generally, development projects that are located in proximity to high-quality transit areas or that otherwise result in VMT reductions compared to existing conditions are presumed to cause a less than significant transportation impact. Projects that exceed the applicable thresholds are considered to result in a potentially significant impact. The City allows lead agencies and applicants discretion in selecting the most appropriate methodology to evaluate VMT, which may include regional travel demand models, approved VMT estimation tools, or professional judgment supported by substantial evidence. The City's thresholds and methodologies are intended to reduce automobile dependence, promote multimodal transportation, and support statewide greenhouse gas reduction goals while ensuring consistency with regional transportation planning.

Regional

Southern California Association of Governments 2024-2045 Regional Transportation Plan / Sustainable Communities Strategy

In compliance with SB 375, on April 4, 2024, the Southern California Association of Governments (SCAG) Regional Council adopted the 2024-2050 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal 2024, and certified its Program Environmental Impact Report. The 2024-2050 RTP/SCS establishes a long-range visioning framework for transportation investments and land use strategies across the six-county SCAG region (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties). The plan is intended to integrate

regional transportation planning with sustainable land use patterns to achieve greenhouse gas (GHG) reduction targets established by the California Air Resources Board (CARB), improve mobility, and enhance the overall quality of life for Southern California residents.

The 2024-2050 RTP/SCS incorporates updated baseline socioeconomic projections and growth forecasts to guide transportation planning, funding decisions, and service provision throughout the region. It reflects updated assumptions regarding population, housing, employment, and travel demand, and serves as the policy framework for regional transportation improvements and land use coordination. Similar to its predecessor, the 2020-2045 RTP/SCS, Connect SoCal 2024 directs a substantial share of forecasted growth to Priority Growth Areas (PGAs), which include High-Quality Transit Areas (HQTAs), Transit Priority Areas (TPAs), Neighborhood Mobility Areas (NMAs), Job Centers, and Livable Corridors. By concentrating growth in these areas—which together make up a small share of the region's land area but account for the majority of planned growth—the Plan seeks to reduce vehicle miles traveled (VMT), increase transit ridership, and promote compact, walkable development patterns.

- **High-Quality Transit Areas (HQTAs):** Areas within 0.5 miles of existing or planned major transit corridors or stops with service frequencies of 15 minutes or less during peak commuting hours.
- **Transit Priority Areas (TPAs):** Locations within 0.5 miles of an existing or planned major transit stop.
- **Neighborhood Mobility Areas (NMAs):** Areas with a mix of residential and non-residential uses, higher street connectivity, and pedestrian-friendly design, intended to reduce reliance on automobile travel.
- **Job Centers:** Areas of higher-than-average employment density, representing concentrations of economic activity across the region.
- **Livable Corridors:** Major arterial roadways where jurisdictions can implement strategies for higher-density development, increased transit service, active transportation infrastructure, and complete streets improvements.

The 2024-2050 RTP/SCS builds upon the Core Vision of the prior plan, emphasizing the maintenance and management of the existing transportation network, co-location of housing, jobs, and transit, and increased investment in transit, complete streets, and emerging mobility strategies. Strategies include Smart Cities and Job Centers, Housing-Supportive Infrastructure, Go Zones, Shared Mobility, and investments in zero-emission vehicle infrastructure. The plan also emphasizes climate resilience, with expanded policies and investments to reduce vulnerability to extreme heat, sea level rise, wildfires, and other climate-related risks.

The performance outcomes of the 2024-2050 RTP/SCS include measurable improvements in sustainability, mobility, and equity. The Plan demonstrates consistency with CARB-mandated GHG reduction targets through reductions in per-capita VMT, improved air quality, reduced vehicle hours of delay, and an increase in transit ridership and active transportation trips. The plan also advances environmental justice goals by directing investment toward historically underserved communities and improving equitable access to transportation choices. Overall, the 2024-2050 RTP/SCS provides a comprehensive strategy to meet the region's future housing and mobility needs while addressing statewide climate change and air quality goals.

Local

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 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.

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/from destinations and first/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 5.2:** Provide Safety Education and Implement Safety Programs to Public Schools. Implement a Safe Route to School Plan that would determine the routes used by the students and measures to improve mobility/safety/infrastructure to school. Implement Safe Route to School Programs to all Inglewood public schools. Provide active transportation safety education to the community. Use Neighborhood Traffic Control techniques when excessive vehicle speed, excessive volume, or pedestrian/vehicle safety concerns warrant them.

City of Inglewood General Plan Land Use Element

The City's General Plan Land Use Element, that was amended in 2016, outlines 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.

City of Inglewood Active Transportation and Safe Routes to School Master Plan

The purpose of the City's Active Transportation and Safe Routes to School Master Plan (ATP/SRTS) is to create a Complete Streets update to the City of Inglewood General Plan. The ATP/SRTS Plan sets forth goals, policies and strategies pertaining to accident and traffic safety, transit and public transportation, ensuring easy and convenient access to the regional facilities, bicycle routes and pedestrian facilities, among other things. Relevant adopted policies include:

Policy 1.2: Ensure that planning, design and implementation documents are adhered to – Ensure that new development projects go through review processes for compliance with the ATP/SRTS.

Policy 1.3: Revise the Municipal Code on crosswalk installation, removal, and enhancement – Adopt the high-visibility continental crosswalk treatment as the standard along school routes and crossings with multi-lane streets, and where pedestrian activity demands it.

Policy 3.1: Achieve a safe, comfortable and attractive pedestrian environment for people of all ages and abilities – Explore the use of 15 mph school zones by conducting necessary analysis.

Policy 4.1: Facilitate the provision of quality bicycle support facilities at local and regional destinations – Provide convenient, highly visible, and secure bicycle parking at schools, parks, public buildings, private development including the Hollywood Park development site, and other destinations where demand is needed.

Policy 5.1: Encourage and support comprehensive pedestrian and bicycle safety education awareness programs for pedestrians, bicyclists, and motorists – Work with local schools to implement and institutionalize a comprehensive pedestrian and bicycle education program that teaches all school children to follow the rules of the road. Encourage schools and school districts to implement a comprehensive pedestrian and bicycle education program for their students, faculty and staff. Encourage the inclusion of pedestrian and bicycle education for crossing guards and bus drivers in their training programs.

Policy 5.2: Actively encourage City staff, employees, residents, visitors and students to walk and bicycle as often as possible – Encourage schools to coordinate a "Bike to School Day" event. Encourage schools to participate in "International Walk to School Day" every October.

Policy 6.1: Provide equal pedestrian and bicycle access for all through public engagement, program delivery, and capital investment – Strengthen partnerships with the County of Public Health, community-based organizations, school district, faith-based institutions and others that can help to realize the economic, health and societal benefits of walking and bicycling to the greater public.

Policy 6.2: Improve personal safety for students walking and bicycling to school – Ensure students feel safe while walking and bicycling to and from school by providing enhanced street lighting and maintaining overgrown shrubbery along sidewalks.

Existing Conditions

The Project site is located at 231 South Grevillea Avenue in the western central portion of the City of Inglewood, California. The Project site is generally bounded by West Manchester Boulevard to the north, West Kelso Street to the south, Grevillea Avenue to the east, and residential homes and a retirement community to the west. Students currently arrive at school by car, walk, bike, or use public transportation. School bus service is not provided except for special education students. Drop-off/pick-up loading activities occur generally along South Grevillea Avenue and West Kelso Street while there is currently no

formal loading zone (i.e., curb markings or posted signage) designated. The school year runs from late August through early June; summer school sessions also occur on campus. School hours and the associated bell schedule are generally between 8:30 AM to 3:15 PM Monday through Friday, with the exception that Tuesday end time is 2:20 PM.

4.8.3 Environmental Impacts

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to Transportation if it would:

- **Threshold TRANS-1:** Conflict with a program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities;
- **Threshold TRANS-2:** Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b);
- **Threshold TRANS-3:** Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- **Threshold TRANS-4:** Result in inadequate emergency access.

The District determined in the Initial Study completed for the Project (see Appendix A) that all the transportation thresholds warrant further discussion in the EIR.

Methodology

The analysis of potential transportation impacts evaluates Project-related effects in relation to the CEQA thresholds of significance, consistent with the City of Inglewood's Transportation Impact Analysis (TIA) Guidelines. Specifically, the analysis considers: 1) potential conflicts with adopted transportation-related plans, ordinances, or policies; 2) whether the Project would result in a substantial increase in vehicle miles traveled (VMT); 3) whether the Project would create or exacerbate hazards due to a geometric design feature or incompatible use; and 4) whether the Project would result in inadequate emergency access.

The scope of this analysis was developed in consultation with the City of Inglewood. Trip generation forecasts were prepared using the Institute of Transportation Engineers' (ITE) *Trip Generation Manual* (11th Edition) in accordance with the City's TIA Guidelines. Where applicable, the City's VMT Calculator Tool and adopted VMT screening criteria were applied to determine whether a detailed project-level VMT analysis was required. The subsections below describe the methodologies used to evaluate each CEQA threshold.

Review for Conflicts with Plans, Programs, Ordinances, or Policies

As outlined in the California Environmental Quality Act (CEQA) Guidelines and the City of Inglewood's Circulation Element of the General Plan, transportation analyses must consider whether a project conflicts with adopted programs, plans, ordinances, or policies related to the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The focus is on those policies or standards adopted to protect the environment, support multimodal travel, and reduce reliance on single-occupancy vehicles. The

analysis evaluates whether the Project would conflict with or preclude implementation of the City's adopted transportation-related plans and policies. Under CEQA, such a conflict would only be considered significant if it could foreseeably result in a physical environmental impact. Cumulative conditions are also considered to assess whether the Project, in combination with other development in the study area, could impair the City's ability to meet adopted multimodal transportation goals.

VMT Analysis

Consistent with Senate Bill (SB) 743 and subsequent updates to the CEQA Guidelines, the City of Inglewood has adopted VMT as the primary metric for determining the significance of transportation impacts under CEQA. The City relies on screening criteria and thresholds of significance informed by guidance from the Governor's Office of Planning and Research (OPR), Los Angeles County Metropolitan Transportation Authority (Metro), and regional transportation studies.

The City exempts certain projects from detailed VMT analysis if they fall under defined screening thresholds, including:

1. Non-Retail Projects – Projects that generate fewer than 250 daily vehicle trips.
2. Local-Serving Retail – Projects containing retail uses of less than 50,000 square feet of gross floor area.
3. Affordable Housing – Projects in which 100 percent of the units (excluding manager's units) are reserved for lower-income households

Project trip generation was estimated using rates from the *Institute of Transportation Engineers (ITE) Trip Generation Manual* (11th Edition), consistent with the City's TIA Guidelines. As shown, in Table 1 of the Vehicle Miles Traveled (VMT) Screening Assessment found in Appendix H, the Project is forecast to generate approximately 1,536 daily weekday trips, which exceeds the 250 daily trip threshold for non-retail projects. The Project does not propose residential units and therefore does not meet the affordable housing screening criterion.

However, the Project qualifies under the local-serving project screening criterion. The Project involves reconstruction of Inglewood High School, which will continue to serve local students, faculty, and community members, including through use of recreational amenities such as playing fields and courts. Based on City staff's application of the City's VMT Calculator Tool, the faculty/staff increase associated with the Project equates to approximately 12,270 square feet of office use, which is substantially below the 50,000 square-foot retail screening threshold. As noted in the City's Resolution and consistent with OPR's Technical Advisory, local-serving projects generally redistribute existing trips rather than create new ones, shortening trip lengths and reducing overall VMT.

Accordingly, the Project is presumed to result in a less than significant impact on VMT and is screened out of further VMT analysis under the City's TIA Guidelines.

Transportation Demand Management

A TDM Program consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. Strategies included in a typical TDM Program address a wide range of transportation factors, including

parking, transit, commute trips, shared mobility, bicycle infrastructure, site design, education and encouragement, and management.

Geometric Design Feature or Incompatible Use Hazards

For vehicle, bicycle and pedestrian safety impacts, a review is conducted for all Project access points, internal circulation, and parking access from an operational and safety perspective (e.g., turning radii, driveway queuing, line-of-sight for turns into and out of project driveway[s]). Where Project driveways would cross pedestrian facilities or bicycle facilities (bike lanes or bike paths), the analysis considers operational and safety issues related to the potential for auto/pedestrian and auto/bicycle conflicts and the severity of consequences that could result.

Emergency Access

For emergency access impacts, a review is conducted for Project access points, internal circulation, and parking access to determine if adequate emergency access is provided. The analysis considers the physical conditions of the Project Site and surrounding area, such as curves, slopes, walls, landscaping or other barriers. Also, a determination is made as to whether the Project would preclude adequate emergency access within the adjacent roadway network.

Project Design Features

The following project design features are applicable to the Project:

PDF-TRAF-1: Construction Traffic Management Plan. A Construction Traffic Management Plan will be prepared for the phases of the proposed Project that affect offsite components or require increased vehicle access consistent with the LADOT Construction Traffic Control Guidelines and the City of Inglewood. This plan will address the planned Project construction phasing, sequence of construction activities, access, and circulation. In addition, the plan would include planned detour routes and BMPs, as well as coordination with and advance notice to local emergency providers.

PDF-TRAF-2: Construction Staging Plan. A construction staging plan will be developed to reduce impacts related to noise, dust, traffic, and other health hazards In addition, construction site BMPs (e.g., fencing, signs, and detours) shall be implemented to minimize hazards and prevent safety issues on the roadways and sidewalks surrounding the construction site.

PDF-TRAF-3: Construction Traffic. Construction-related trips including large truck travel will be scheduled with increased frequency during off-peak hours to minimize impacts to commuters.

Analysis of Project Impacts

Threshold TRANS-1: The Project would have a potentially significant impact on transportation if it would conflict with a program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities.

Impact Analysis

As previously discussed, the City of Inglewood has adopted several transportation-related plans and policies that guide mobility, safety, and land use decisions within the city. These include the 2019 City of Inglewood Mobility Plan, the City's General Plan Land Use Element, and the City's Active Transportation and Safe Routes to School Master Plan (ATP/SRTS). Each of these documents provides goals, policies, and implementation strategies relevant to multimodal transportation, roadway safety, and the integration of land use and circulation planning.

The analysis below evaluates the Project's consistency with these applicable plans and policies, as further detailed in the VMT Screening Assessment (Appendix H) and this Draft EIR.

2019 City of Inglewood Mobility Plan

The 2019 City of Inglewood Mobility Plan establishes a framework of goals, strategies, and actions to promote sustainability, multimodal travel, and roadway safety throughout the City. Relevant goals and strategies applicable to the Project include Goal No. 1 (Sustainability and Environmental Considerations), Goal No. 3 (Create an Efficient, Balanced, Multimodal Mobility Network), and Goal No. 5 (Safety). **Table 4.8-1** provides determinations of whether the Project would conflict with the applicable goals and strategies. As shown therein, the Project would not conflict with any of the applicable goals or strategies.

The Project is consistent with the applicable goals and strategies of the 2019 City of Inglewood Mobility Plan. The Project improves on-site circulation, pedestrian and bicycle access, safety, and accessibility, while supporting multimodal travel and promoting active transportation. Fire lane improvements and enhanced vehicle and pedestrian circulation ensure safe access for all users, and the Project's location near existing transit stops supports sustainable commuting options. No conflicts with adopted Mobility Plan goals or strategies were identified, and the Project would not result in a significant impact with respect to the City's Mobility Plan.

City of Inglewood General Plan Land Use Element

The City of Inglewood General Plan Land Use Element, as amended in 2009, includes circulation goals and objectives that are consistent with the City's Mobility Plan and guide transportation planning to support safe, efficient, and sustainable travel within the City. Applicable goals and objectives include promoting adequate public transportation, discouraging through-traffic in neighborhoods, and ensuring a safe and efficient circulation system for all users. **Table 4.8-2** provides determinations of whether the Project would conflict with the applicable goals and objectives. As shown therein, the Project would not conflict with any of the applicable goals or objectives.

TABLE 4.8-1
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES OF THE 2019 CITY OF INGLEWOOD MOBILITY

Action	Would the Project Conflict?
Goal No. 1: Sustainability and Environmental Considerations Strategy 1.1 – Relieve Congestion. Apply Transportation Demand Management (TDM) programs to reduce single-occupancy vehicle trips, including incentives for walking, biking, or transit; bicycle-friendly facilities; and carpool/vanpool programs.	**No Conflict.** The Project would modernize and consolidate educational facilities on the Inglewood High School campus, thereby reducing the reliance on temporary portable classrooms and enhancing accessibility within the campus. The reconstructed facilities would improve pedestrian and bicycle circulation on-site and provide opportunities for staff and students to access the campus by walking, bicycling, or transit. Bicycle parking and improved pedestrian pathways would support the use of active transportation consistent with City TDM principles.
Goal No. 3: Create an Efficient, Balanced, Multimodal Mobility Network Strategy 3.1 – Complete Streets. Develop and enhance pedestrian and bicycle networks, including bike paths, lanes, hubs, and secure parking at major transit locations.	**No Conflict.** The Project incorporates accessible pedestrian pathways throughout the campus, a new pedestrian entrance at Grevillea Avenue/Nutwood Street, and 32 student bicycle parking spaces plus 8 covered staff bicycle spaces. Fire lane improvements and internal circulation minimize conflicts with pedestrian and bicycle traffic. These measures align with Complete Streets principles and support safe multimodal access.
Goal No. 5: Safety – Maintain and promote safety for all users Strategy 5.1 – Promote Safer Transportation Network. Provide multimodal infrastructure that is safe and accessible, especially for vulnerable populations such as children and the elderly.	**No Conflict.** As a high school educational facility, the Project directly serves school-aged children. The Project would upgrade pedestrian walkways, remove outdated asphalt areas, and improve landscaping, thereby enhancing safety and accessibility across the campus for students, staff, and visitors.
Strategy 5.2 – Provide Safety Education and Implement Safety Programs to Public Schools. Implement Safe Routes to School Plans and programs, safety education, and neighborhood traffic control where warranted.	**No Conflict.** The Project supports the City's Safe Routes to School objectives by improving campus access points, walkways, and circulation patterns, ensuring safe pedestrian routes within and around the school. In addition, the District's existing participation in active transportation and student safety programs would continue with the new facilities, consistent with City policy.

Source: ESA, 2025

TABLE 4.8-2
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES OF THE CITY OF INGLEWOOD GENERAL PLAN LAND USE ELEMENT

Action	Would the Project Conflict?
Promote and support adequate public transportation within the City and the region.	**No Conflict.** The Project would reconstruct and modernize educational facilities at Inglewood High School, improving pedestrian and bicycle connections to nearby public transit stops on Manchester Boulevard and surrounding corridors. The Project site is located adjacent to Manchester Boulevard, which is served by multiple Los Angeles County Metropolitan Transportation Authority (Metro) bus routes. The Project would not interfere with transit operations or access to existing bus stops along Manchester Boulevard or Eucalyptus Avenue. On-site pedestrian walkways and a new entrance at Grevillea Avenue/Nutwood Street would improve connectivity to transit stops, supporting use of public transportation by students, staff, and visitors.

Action	Would the Project Conflict?
Develop modified traffic systems that will discourage through traffic from utilizing neighborhood streets.	**No Conflict.** Vehicular access would continue to be provided from Manchester Boulevard and Kelso Street, both designated collector/arterial roadways, rather than from adjacent neighborhood streets. The Project does not introduce new public roadways or cut-through connections, and internal circulation is limited to emergency vehicles via a designated fire lane. Student drop-off and pick-up activity would remain on campus, minimizing intrusion into nearby residential streets.
Develop a safe and efficient circulation system which is barrier free for the handicapped.	**No Conflict.** The Project would improve on-campus pedestrian circulation through upgraded sidewalks, barrier-free pathways, ADA-compliant entries, and improved lighting and landscaping. These improvements would provide safe and accessible circulation for students, staff, visitors, and individuals with disabilities, consistent with City policy.

Source: ESA, 2025

Based on the above evaluation, the Project is consistent with the applicable circulation and transportation policies of the City of Inglewood General Plan Land Use Element. The Project improves on-site circulation, pedestrian and bicycle access, parking, and accessibility for persons with disabilities, while maintaining safe and efficient access to surrounding streets and public transit. No conflicts with adopted policies were identified, and the Project would therefore not result in a significant impact related to consistency with the City's Land Use Element.

City of Inglewood Active Transportation and Safe Routes to School Master Plan (ATP/SRTS)

The purpose of the City of Inglewood Active Transportation and Safe Routes to School Master Plan (ATP/SRTS) is to provide a Complete Streets update to the City's General Plan. The ATP/SRTS sets forth goals, policies, and strategies focused on accident and traffic safety, transit and public transportation, pedestrian access, and bicycle infrastructure. The Plan was prepared with significant community input, including workshops focused on improving safety for students traveling to and from school. Specific intersection improvements near the Inglewood High School campus were identified to enhance pedestrian and bicycle safety, including improvements at Manchester Avenue/Grevillea Avenue and Grevillea Avenue/Nutwood Street. **Table 4.8-3** presents the consistency of the Inglewood High School Reconstruction Project with applicable policies of the ATP/SRTS Plan.

The ATP/SRTS Plan identifies specific improvements to enhance pedestrian and bicycle safety around Inglewood High School, including enhanced crosswalks, curb extensions, pedestrian beacons, and traffic calming measures. The Project would not preclude implementation of these improvements and would instead complement them by improving on-site pedestrian and bicycle circulation, providing secure bicycle parking, and enhancing safe connections to public sidewalks and nearby transit stops. The Project is therefore consistent with the adopted policies of the ATP/SRTS and would have a less than significant impact on active transportation and public transit in the vicinity of the Project site.

TABLE 4.8-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES OF THE CITY OF INGLEWOOD ATP/SRTS PLAN

Action	Would the Project Conflict?
Policy 1.2: Ensure that planning, design and implementation documents are adhered to.	**No Conflict.** The Project has undergone review for consistency with the ATP/SRTS, including pedestrian and bicycle access provisions. Project improvements such as widened sidewalks, landscaping, provision of bicycle parking spaces, and exclusive pedestrian walkways support compliance with adopted City policies.
Policy 1.3: Revise the Municipal Code on crosswalk installation, removal, and enhancement.	**No Conflict.** The ATP/SRTS identifies crosswalk enhancements at nearby intersections, including Manchester Avenue/Grevillea Avenue and Grevillea Avenue/Nutwood Street. The Project would not preclude implementation of these improvements and would complement them by improving on-site access to public sidewalks that connect to enhanced crossings.
Policy 3.1: Achieve a safe, comfortable, and attractive pedestrian environment for people of all ages and abilities.	**No Conflict.** The Project provides upgraded pedestrian walkways and ADA-compliant access points throughout the campus, minimizing conflicts with vehicles and encouraging safe and convenient pedestrian circulation for students, staff, and visitors of all abilities.
Policy 4.1: Facilitate the provision of quality bicycle support facilities at local and regional destinations.	**No Conflict.** The Project includes secure and convenient bicycle parking, with 32 student bicycle spaces near the main campus entrance and eight covered staff bicycle spaces in a lockable enclosure. These facilities directly support City policy to provide bicycle amenities at schools.
Policy 5.1: Encourage and support comprehensive pedestrian and bicycle safety education awareness programs.	**No Conflict.** As a high school educational facility, the Project supports pedestrian and bicycle education opportunities for students. The Project does not conflict with City programs to expand pedestrian and bicycle safety education in schools.
Policy 5.2: Actively encourage walking and bicycling through school-based events.	**No Conflict.** The Project would not hinder District participation in events such as Bike to School Day or International Walk to School Day, and improved facilities would encourage greater participation in such programs.
Policy 6.1: Provide equal pedestrian and bicycle access for all through public engagement, program delivery, and capital investment.	**No Conflict.** The Project improves site circulation, enhances pedestrian comfort, and provides secure bicycle facilities, consistent with the City's objectives to promote equitable access.
Policy 6.2: Improve personal safety for students walking and bicycling to school.	**No Conflict.** The Project enhances pedestrian safety through upgraded walkways, improved lighting, and landscaped buffers. These measures support the ATP/SRTS goal of ensuring students feel safe while traveling to and from school.

Source: ESA, 2025

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance after Mitigation

Not applicable. Project specific impacts related to conflicts with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant.

Threshold TRANS-2: The Project would have a potentially significant impact on transportation if it would conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b).

Impact Analysis

The Inglewood High School Reconstruction Project is expected to generate trips associated with students, faculty, staff, and visitors accessing the campus. Based on project-specific trip generation estimates derived from the ITE Trip Generation Manual (2017), the Project would generate approximately 1,536 daily weekday trips, including 214 trips during the AM peak hour and 214 trips during the PM peak hour. Saturday trips are estimated at 232 peak-hour trips and 2,392 total daily trips, primarily associated with the new recreational facilities, including playing fields, basketball courts, and tennis courts, as well as the net increase of 40 staff members. These trips are generally local-serving and primarily related to the school and recreational facilities, limiting their overall effect on regional VMT.

The Project incorporates multiple design features to reduce vehicle trips, encourage alternative transportation modes, and maintain safe and efficient circulation. Pedestrian access would be improved through ADA-compliant walkways throughout the campus and a new pedestrian entrance at Grevillea Avenue/Nutwood Street, while bicycle access would be provided with 32 student bicycle parking spaces near the main entrance and eight covered staff bicycle parking spaces within Building 1. The Project site is adjacent to existing Metro bus stops along Manchester Boulevard and Eucalyptus Avenue, providing convenient access to public transit for students, staff, and visitors. On-site vehicular circulation would be enhanced through reconfigured parking (158 total spaces, including standard, EV, and ADA-accessible stalls) and a dedicated emergency fire lane connecting Manchester Boulevard and Kelso Street, minimizing conflicts between vehicles, pedestrians, and bicyclists while discouraging cut-through traffic on nearby residential streets.

Construction-related traffic would be managed through Project Design Features to further reduce potential impacts. PDF-TRAF-1 ensures that a Construction Traffic Management Plan is prepared for phases affecting offsite access, including planned detour routes, BMPs, and coordination with emergency providers. PDF-TRAF-2 implements a Construction Staging Plan to minimize noise, dust, traffic, and safety hazards near the site using fencing, signage, and controlled detours. PDF-TRAF-3 schedules construction trips including large truck travel during off-peak hours whenever feasible to reduce congestion and impacts to commuters.

Given the Project's trip generation, proximity to transit, pedestrian and bicycle improvements, on-site circulation enhancements, and the implementation of construction-related traffic management features, the Project would result in a less than significant impact with respect to vehicle miles traveled, traffic generation, and circulation. No additional mitigation measures are required. The Project's design features further support safe, efficient, and sustainable access for all campus users and promote active transportation in accordance with the City of Inglewood's planning goals.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance after Mitigation

Not applicable. The Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) and impacts would be less than significant.

Threshold TRANS-3: The Project would have a potentially significant impact on transportation if it would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Impact Analysis

Vehicular access to the Inglewood High School campus would be provided via two driveways along West Manchester Boulevard and three driveways along West Kelso Street. The Manchester Boulevard driveways would provide primary access for students, staff, and visitors, while the Kelso Street driveways would primarily serve staff, deliveries, and emergency vehicles. Pedestrian access to the campus would be provided via multiple accessible entrances, including a new pedestrian entrance at Grevillea Avenue/Nutwood Street, linking to the campus walkways. All pedestrian pathways would comply with ADA standards and provide safe and direct connections to on-campus buildings, bicycle parking areas, and public sidewalks.

The section of West Manchester Boulevard along the campus frontage consists of four travel lanes, two in each direction, with metered parking along portions of the street. Sidewalks are provided along the northern and southern boundaries of the Project frontage. The Project would maintain these sidewalks and pedestrian routes while ensuring that driveway crossings provide adequate sight distance for both drivers and pedestrians. No exceptional horizontal or vertical curvatures exist along this section that would create sight distance issues. Bicycle access would be accommodated via connections to the existing roadway network and proposed active transportation improvements, ensuring that bicyclists can safely navigate across driveways and through campus entrances.

Along West Kelso Street, the roadway provides multiple travel lanes with on-street parking, sidewalks, and pedestrian access points. The Project would maintain existing sidewalks and crossings while minimizing loss of parking to accommodate driveways, loading zones, and fire lane access. Internal circulation improvements, including a new emergency fire lane extending from Manchester Boulevard through the campus to Kelso Street, are designed to meet applicable fire code standards and provide safe, efficient access for emergency vehicles. This internal circulation plan separates emergency and regular vehicular traffic from pedestrian and bicycle pathways, reducing the potential for conflicts.

The Project site is generally level with minor grade changes along the Manchester Boulevard and Kelso Street frontages. The driveways and on-site circulation are designed to intersect public rights-of-way at near-right angles, with sufficient building setbacks and sight lines to allow pedestrians, bicyclists, and drivers to observe each other safely. Internal circulation patterns, parking lot design, and fire lane improvements are configured to minimize congestion and ensure safe ingress and egress for vehicles, pedestrians, and bicycles.

The Project is compatible with surrounding residential and educational uses. The campus redesign, including driveway access, pedestrian pathways, and circulation improvements, does not introduce incompatible uses or create hazards for neighboring properties.

Therefore, the Project would have a less than significant impact with respect to hazards due to geometric design features or incompatible uses. Driveways, internal circulation, pedestrian pathways, and bicycle access have been designed to meet applicable standards and ensure safe interactions between all modes of transportation.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance after Mitigation

Not applicable. Project-specific impacts related to design hazards and incompatible uses would be less than significant.

Threshold TRANS-4: The Project would have a potentially significant impact on transportation if it would result in inadequate emergency access.

Impact Analysis

The Inglewood High School campus is located within an urbanized area with a fully developed roadway network. Direct emergency access is provided via West Manchester Boulevard and West Kelso Street, with additional access points from Grevillea Avenue/Nutwood Street and internal campus roadways. Emergency vehicle circulation within the campus would be supported by a new dedicated fire lane extending from Manchester Boulevard through the center of the campus to Kelso Street, designed to meet applicable fire code standards and provide safe, efficient access for all emergency vehicles.

Construction of the Project is not anticipated to require closures of public roadways, as construction staging would primarily occur within the Project Site. Construction traffic would be temporary and short-term, ceasing upon completion of each construction phase. To ensure safe access during construction, the Project would implement Project Design Features TRAF-PDF-1, TRAF-PDF-2, and TRAF-PDF-3, which include a Construction Traffic Management Plan, a Construction Staging Plan, and scheduling of construction vehicle trips during off-peak hours. These measures would minimize potential conflicts with local traffic, maintain access for pedestrians and bicyclists, and ensure that emergency vehicle access to the campus and surrounding properties is preserved at all times. The Project's contractors would coordinate with the Inglewood Police Department and Fire Department concerning any temporary construction activities that could affect emergency access, including the use of traffic control devices or detours, to avoid delaying emergency response times.

During Project operation, all building, fire lane, and fire hydrant locations will be reviewed and approved by the Division of the State Architect (DSA) to ensure adequate emergency access to and within the campus. The Project's internal circulation, reconfigured parking, and pedestrian pathways are designed to provide unimpeded access for emergency responders. In addition, pursuant to California Vehicle Code

Section 21806, drivers of emergency vehicles are authorized to clear a path of travel in the event of an emergency, ensuring rapid response is maintained.

Based on these considerations, the Project would not require the construction of new emergency access roads, nor would it interfere with existing emergency response routes. Therefore, the Inglewood High School Reconstruction Project would have a less than significant impact with respect to emergency access during both construction and operation.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance after Mitigation

Not applicable. The Project would not result in inadequate emergency access and impacts would be less than significant.

Cumulative Impacts

Impact Analysis

Chapter 2, *Environmental Setting*, of this Draft EIR provides a list of 12 related projects that are planned or are under construction near the Project Site. These projects are summarized in Table 2-1, *Related Projects List*, and shown on Figure 2-1, *Related Projects Map*, in Chapter 2.

As discussed under Threshold TRAF-1 and Threshold TRAF-2, the Project would not conflict with any adopted programs, plans, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, which have been established to promote safe and efficient access and reduce vehicle miles traveled. Each of the related projects considered in this cumulative analysis would be separately reviewed and approved by the City, including verification of consistency with applicable transportation policies and plans. Collectively, the Project and the related projects would add educational, recreational, and residential development in an area with transit accessibility, existing sidewalks, and high levels of pedestrian activity. As with the Project, related projects would be expected to support or enhance pedestrian, bicycle, and other alternative transportation facilities, thereby improving connectivity to the City's multimodal transportation network. Thus, the Project and related projects would not preclude the City's ability to serve transportation needs as defined by the City's mobility and land use policies. Therefore, the Project, in combination with the related projects, would not create inconsistencies or result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances.

Because the Project would generate daily trips and VMT below the City of Inglewood's thresholds of significance, resulting in a less than significant impact on VMT, it would similarly contribute a less than significant impact in cumulative conditions. No additional cumulative VMT analysis is required.

Regarding geometric hazards and driveway access, the Project has been designed to provide safe vehicular, pedestrian, and bicycle circulation within and immediately adjacent to the campus, including internal fire lanes, ADA-compliant walkways, and sightline-verified driveways. Each related project would be required to comply with applicable City standards for driveway design, pedestrian crosswalks, sidewalk provision, and bicycle safety, ensuring safe access is maintained at all times. Since

modifications to circulation are largely confined to individual project sites, the combination of impacts with other related projects is not expected to result in any cumulative hazard-related impacts. Therefore, the Project's contribution to cumulative impacts associated with geometric design hazards would not be considerable.

With respect to emergency access, the Project would not result in significant impacts. The campus and surrounding area are located within a well-developed urban network that provides multiple emergency access and evacuation routes. Drivers of emergency vehicles are able to use sirens or authorized lanes of opposing traffic to maintain emergency response times. Similar to the Project, related projects would implement construction management plans and coordinate with the County of Los Angeles Fire Department and City of Inglewood Police Department to ensure that emergency access is maintained throughout construction and operation. Coordination among related projects would ensure that cumulative construction activities do not interfere with emergency vehicle circulation.

As such, cumulative impacts on transportation would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance after Mitigation

Not applicable. Cumulative impacts related to transportation would be less than significant.

4.9 Tribal Cultural Resources

4.9.1 Introduction

This section evaluates potential impacts on tribal cultural resources. The analysis is based on a Sacred Lands File (SLF) search conducted by the California Native American Heritage Commission (NAHC), consultations between the District and Native American tribes pursuant to Assembly Bill (AB) 52, as well as the *Inglewood High School Reconstruction Project – Archaeological Resources Assessment Report* (Archaeological Report) prepared by ESA, that is provided in Appendix D-2 of this Draft EIR. Native American consultation documentation related to AB 52 consultations is provided in Appendix I of this Draft EIR.

4.9.2 Environmental Setting

Regulatory Framework

The following describes the primary State regulatory requirement (AB 52) regarding tribal cultural resources.

Assembly Bill 52

AB 52 was approved on September 25, 2014. The act amended California Public Resources Code (PRC) Section 5097.94, and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. The primary intent of AB 52 is to involve California Native American Tribes early in the environmental review process and to establish a category of resources related to Native Americans, known as tribal cultural resources, that require consideration under CEQA. PRC Section 21074(a)(1) and (2) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe" that are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence. A tribal cultural resource is further defined by PRC Section 20174(b) as a cultural landscape that meets the criteria of subdivision (a) to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. PRC Section 20174(c) provides that a historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

PRC Section 21080.3.1 requires that, within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a tribal representative, of California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC Section 21073) and who have requested in writing to be informed by the lead agency of projects within their geographic area of concern.[1] Tribes interested in consultation must respond in writing within

[1] Public Resources Code, Section 21080.3.1(b) and (c).

30 days from receipt of the lead agency's formal notification and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation.[2]

PRC Section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project's impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either: (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.[3]

In addition to other CEQA provisions, the lead agency may certify an EIR or adopt a mitigated negative declaration for a project with a significant impact on an identified tribal cultural resource, only if a California Native American tribe has requested consultation pursuant to Section 21080.3.1 and has failed to provide comments to the lead agency, or requested a consultation but failed to engage in the consultation process, or the consultation process occurred and was concluded as described above, or if the California Native American tribe did not request consultation within 30 days.[4]

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Confidentiality does not apply to data or information that are, or become, publicly available, are already in lawful possession of the applicant before the provision of the information by the California Native American tribe, are independently developed by the applicant or the applicant's agents, or are lawfully obtained by the applicant from a third party that is not the lead agency, a California Native American tribe, or another public agency.[5]

Existing Conditions

The Project Site is situated within land traditionally occupied by the Gabrielino (including the Tongva and Kizh). The following summary is not intended to provide a comprehensive account of this group but is instead a brief historical overview based on available information from resources cited below.

[2] Public Resources Code, Sections 21080.3.1(d) and 21080.3.1(e).
[3] Public Resources Code, Section 21080.3.2(b).
[4] Public Resources Code, Section 21082.3(d)(2) and (3).
[5] Public Resources Code, Section 21082.3(c)(2)(B).

Gabrielino (or Tongva or Kizh)

The term "Gabrielino" is a general term that refers to those Native Americans who were sent by the Spanish to the Mission San Gabriel Arcángel. (Bean and Smith 1978). Two indigenous terms are commonly used by tribal groups to refer to themselves and are preferred by descendant groups: Tongva and Kizh (Heizer 1968). Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina (Bean and Smith 1978). Their neighbors included the Chumash and Tataviam to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino are reported to have been second only to the Chumash in terms of population size and regional influence (Bean and Smith 1978). The Gabrielino language was part of the Takic branch of the Uto-Aztecan language family.

The Gabrielino Indians were hunter-gatherers and lived in permanent communities located near the presence of a stable food supply. Subsistence consisted of hunting, fishing, and gathering. Small terrestrial games were hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows (Bean and Smith 1978). Community populations generally ranged from 50 to 100 inhabitants, although larger settlements may have existed. The Gabrielino are estimated to have had a population numbering around 5,000 in the pre-contact period (Kroeber 1925). The Late Prehistoric period, spanning from approximately 1,500 years B.P. to the mission era, is the period associated with the florescence of the Gabrielino (Wallace 1955). Coming ashore near Malibu Lagoon or Mugu Lagoon in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino Indians. Maps produced by early explorers indicate that at least 26 Gabrielino villages were within proximity to known Los Angeles River courses, while an additional 18 villages were reasonably close to the river (Gumprecht 2001).

Maps produced by early explorers indicate that at least 26 Gabrielino villages were within proximity to known Los Angeles River courses, while an additional 18 villages were reasonably close to the river (Gumprecht 2001). Review of a map titled *Kirkman-Harriman Pictorial and Historical Map of Los Angeles County* (Kirkman 1938) shows that an unnamed settlement/village is located southeast and at the foot of Baldwin Hills and north of Aguaje de la Centinela. The Kirkman (1938) map also depicts an "Old Salt Road" used by Native Americans in the vicinity of the Project Site. This salt road appears to be connected with the Old Salt Lake used by Native Americans.

The closest named settlements to the Project Site are *Saa'anga* and *Waachnga*. Review of a map titled *Gabrielino Communities Located on the Los Angeles-Santa Ana Plain* by William McCawley (1996) indicates that the settlement of *Saa'anga* was located approximately 2.5 miles away from the Project Site, while the settlement of *Waachnga* was situated approximately 2 miles away. Both of these settlements are depicted as located close to Ballona Creek.

South Central Coastal Information Center Records Search

A records search for the Project Site was conducted on January 17, 2025, at the California Historical Resources Information System-South Central Coastal Information Center (CHRIS-SCCIC) housed at California State University, Fullerton by ESA. The records search included a review of all recorded cultural resources (archaeological and historic architectural) and previous studies within the Project Site

and a 0.50-mile radius. A previous records search for another project conducted by ESA and located in the vicinity of the Project Site was also reviewed for previously recorded archaeological resources (ESA 2023).

The records search results indicate that 15 cultural resources studies have been conducted within a 0.50-mile radius of the Project Site. Approximately 5 percent of the 0.50-mile records search radius has been included in previous cultural resources assessments involving pedestrian surveys. Of the 15 previous assessments, one study (LA-02904) covered the Project Site as well as a large area along the western coastal zone of the Los Angeles Basin; however, this study only consisted of a literature review and did not include a pedestrian survey of the Project Site.

The records search results indicate that a total of six cultural resources have been recorded within the 0.50-mile radius. Of the six resources, all are historic architectural resources (P-19-186693, -188843, -189454, -189987, -190143, and -190144). None of these resources are located within the Project Site; however, one (P-19-186693) is located within 100 feet of the Project Site. No archaeological resources (historic or prehistoric) have been previously recorded within the Project Site or 0.50-mile radius. However, review of a previous records search for another project located in the vicinity of the Project Site indicates that a total of five prehistoric archaeological resources (CA-LAN-59, -60, -213, -216, -2768) have been recorded in the general vicinity of the Project Site. More specifically, these prehistoric archaeological resources were recorded in the vicinity of Centinela Creek and approximately 1.8 to 2.8 miles from the Project Site. The current Project Site is also located in the immediate vicinity of Centinela Creek.

Other Archival Research

Additional archaeological resources (the report for which have not yet been archived at the CHRIS-SCCIC as it is still in progress) were identified approximately 4.5 miles from the Project Site during ground disturbing activities in connection with a development project in Downtown Culver City (ESA 2022). These include two isolated prehistoric metates that were recovered in the upper six feet of disturbed fill sediments in an area of the property that had been previously developed with a large warehouse building.

Sacred Lands File Search

The Native American Heritage Commission (NAHC) maintains a confidential Sacred Lands File (SLF) which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on December 20, 2024, to request a search of the SLF. The NAHC responded to the request in a letter dated January 9, 2025, indicating that the results were negative. However, the NAHC noted that the absence of site information does not mean the absence of cultural resources in a project area.

Assembly Bill 52 Tribal Consultation

The District submitted notification and request to consult letters to the Native American individuals and organizations listed below on February 25, 2025.

- Charles Alvarez and Sam Dunlap, Gabrieleño-Tongva Tribe
- Vanessa Minott and Steven Estrada, Santa Rosa Band of Cahuilla Indians

- Anthony Madrigal, BobbyRay Esparza and Erica Schenk, Cahuilla Band of Indians
- Sandonne Goad, Gabrieleño/Tongva Nation
- Robert Dorame and Christina Conley, Gabrieleño Tongva Indians of California Tribal Council
- Andrew Salas and Christina Swindall Martinez, Gabrieleño Band of Mission Indians – Kizh Nation
- Anthony Morales, Gabrieleño/Tongva San Gabriel Band of Mission Indians
- Joseph Ontiveros and Jessica Valdez, Soboba Band of Luiseño Indians

On March 18, 2025, the Gabrieleño Tongva Indians of California Tribal Council (Gabrieleño Tongva) indicated via email that they had concerns regarding the proximity of the Project Site to known tribal cultural sites. On May 12, 2025 the Gabrieleño Tongva indicated to the District (via consultation call) that they suspect tribal cultural resources may be on site, recommended monitoring, and provided their own recommended mitigation measures for tribal construction monitoring. However, the Gabrieleño Tongva did not provide evidence of where these tribal cultural resources may be located. On November 26, 2025, the District provided the Project's mitigation measures (which incorporates the many elements of the Gabrieleño Tongva's recommended measures) to the Gabrieleño Tongva and requested their review and comments by December 5, 2025. On December 1, 2025, the Gabrieleño Tongva approved the mitigation measures with some minor revisions and consultation was closed on December 11, 2025.

On March 20, 2025, the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) requested a consultation meeting with the District. Since March 2025, the District made several attempts to set up a consultation call with the Kizh Nation but they did not receive a response from the Kizh Nation. On November 5, 2025, the District followed up with the Kizh Nation and indicated that the District was in the process of preparing a focused EIR and that there would be an opportunity for the Kizh Nation to comment on the Draft EIR during the public review period. The Kizh Nation replied on the same day and indicated that they will submit public comments for inclusion and consideration in the Final EIR.

The District did not receive any other responses from the Native American community.

4.9.3 Project Impacts

Thresholds of Significance

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the CEQA Guidelines. Accordingly, a significant impact to tribal cultural resources would occur if:

- **TCR-1:** The Project would 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

    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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Methodology

The analysis is based on a SLF search conducted by the NAHC, consultations between the City and Native American tribes pursuant to AB 52, as well as the Archaeological Report prepared by ESA. Specifically, the City submitted notification and request to consult letters to Native American individuals and organizations and conducted follow-up Native American consultation.

Project Design Features

There are no project design features relative to tribal cultural resources.

Analysis of Project Impacts

Threshold TCR-1: The Project would result in a significant tribal cultural resources impact if it would 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

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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact Analysis

As discussed in the Archaeological Report, five prehistoric archaeological resources have been recorded outside the 0.50-mile radius, but in close proximity to Centinela Creek, which demonstrates prehistoric occupation was a common occurrence in the vicinity of this creek. Given the Project Site's location in the vicinity of Centinela Creek, an unnamed Native American village in the vicinity, and the "Old Salt Road" used by Native Americans, the Project Site has the potential to retain buried prehistoric archaeological resources.

On March 18, 2025, the Gabrieleño Tongva Indians of California Tribal Council (Gabrieleño Tongva) indicated via email that they had concerns regarding the proximity of the Project Site to known tribal cultural sites. On May 12, 2025, the Gabrieleño Tongva indicated to the District (via consultation call) that they suspect tribal cultural resources may be on site, recommended monitoring, and provided their own recommended mitigation measures for tribal construction monitoring. However, the Gabrieleño Tongva did not provide evidence of where these tribal cultural resources may be located. On November 26, 2025, the District provided the Project's mitigation measures (which incorporates the many elements of the Gabrieleño Tongva's recommended measures) to the Gabrieleño Tongva and requested their

review and comments by December 5, 2025. On December 1, 2025, the Gabrieleño Tongva approved the mitigation measures with some minor revisions and consultation was closed on December 11, 2025.

On March 20, 2025, the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) requested a consultation meeting with the District. Since March 2025, the District made several attempts to set up a consultation call with the Kizh Nation but they did not receive a response from the Kizh Nation. On November 5, 2025, the District followed up with the Kizh Nation and indicated that the District was in the process of preparing a focused EIR and that there would be an opportunity for the Kizh Nation to comment on the Draft EIR during the public review period. The Kizh Nation replied on the same day and indicated that they will submit public comments for inclusion and consideration in the Final EIR. As a result, specific evidence of village locations located within or overlapping the Project Site was not provided. Therefore, no known tribal cultural resources, as defined in PRC Sections 21074(a)(1), or resources determined by the District in its discretion and supported by substantial evidence to be significant pursuant to PRC Section 5024.1 have been identified within the Project Site or immediate vicinity as a result of tribal consultation.

However, due to the Project Site being located in the vicinity of Centinela Creek, an unnamed Native American village in the vicinity, and the "Old Salt Road", the Project Site has a moderate to high potential for encountering previously unknown tribal cultural resources during construction of the Project. As a result, there is potential that the Project could cause a substantial adverse change in the significance of a tribal cultural resource as described in PRC Section 21084.2. Accordingly, impacts on tribal cultural resources are considered potentially significant, and mitigation measures are provided below.

Mitigation Measures

Refer to Mitigation Measure CUL-2. The following mitigation measures are required to address potentially significant impacts to tribal cultural resources during Project construction:

> **MM-TCR-1:** Prior to the issuance of a demolition permit for the Project, the District shall retain a Native American Monitor(s) from a Gabrielino Tribe (or Tribes). The Native American Monitor(s) shall be present during the following construction activities that have the potential for encountering tribal cultural resources: demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Project, whether on the Project Site or in connection with Project off-site improvements (collectively "ground disturbing activities"). Notwithstanding the foregoing, Native American monitoring shall not be required for any moving of soils that have been monitored or observed prior to their disturbance and subsequently disturbed or displaced by Project-related construction. The Tribe(s) shall prepare a monitoring agreement for review and approval by the District that outlines the roles and responsibilities of the Native American Monitor(s).
>
> Prior to commencement of ground disturbing activities, a Tribal Cultural Resources Sensitivity Training session shall be held for those construction personnel who will be directly involved in the ground disturbing activities. The training session shall be carried out by the Native American Monitor(s) and shall focus on how to identify tribal cultural resources that may be encountered during ground disturbing activities and the procedures to be followed in such an event. If the Native American Monitor(s) is not present at the Project Site on any given workday, the ground

disturbing activities may continue if the workers involved in such activities attended the training session.

Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor(s) in the event there appears to be little to no potential for impacting tribal cultural resources. Native American monitoring shall conclude no later than conclusion of ground disturbing activities.

MM-TCR-2: The Native American Monitor(s) shall complete daily monitoring logs that 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, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the District upon written request to the Tribe(s). The District shall not be deemed to be out of compliance with this measure if the Native American Monitor(s) fails to complete or submit any such monitoring logs.

MM-TCR-3: In the event of a discovery of potential tribal cultural resources at the Project Site, the Qualified Archaeologist identified in Mitigation Measure CUL-1 (after consultation with the Native American Monitor[s]) shall have the authority to temporarily divert, redirect, or halt ground-disturbance activities to allow identification, evaluation, and potential recovery of such potential resources. After consulting with the Tribe(s) and the District, the Qualified Archaeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where ground-disturbing activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

Within three (3) business days of such discovery, a meeting shall take place between the District, the Qualified Archaeologist, and the Tribe(s) to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Tribe(s) and the Qualified Archaeologist, the District determines, based on substantial evidence, that the resource is in fact a tribal cultural resource, the Qualified Archaeologist shall develop a reasonable and feasible treatment plan, with input from the Tribe(s) as necessary. The treatment measures in the treatment plan shall be in compliance with any applicable federal, State, or local laws, rules or regulations. The treatment plan shall also include measures regarding the curation of the recovered resources. If there is disagreement between the Tribes and the Qualified Archaeologist as to the treatment measures for the resource, the District, as lead agency, shall make the final decision on treatment after receiving input from the parties involved.

The District may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the treatment measures developed and approved pursuant to the process set forth in the above paragraphs.

The recovered Native American resources may be placed in the custody of the Tribe(s), who may choose to use them for their educational purposes or they may be curated at a public, non-profit institution (such as the University of California Los Angeles) with a research interest in the materials. If neither the Tribe(s) nor an institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.

Level of Significance after Mitigation

In the event unknown tribal cultural resources are unearthed during construction of the Project, with implementation of the above mitigation measures, potentially significant impacts on tribal cultural resources would be reduced to a less than significant level.

Cumulative Impacts

Impact Analysis

As demonstrated above, prior to mitigation, the Project would have a potentially significant impact on tribal cultural resources even though there are no resources listed or determined eligible for listing, on the national, State, or local register of historical resources, and the Lead Agency determined that no resources were identified during AB 52 tribal consultation that are eligible for listing under the criteria in PRC Section 5024.1(c). This significant impact finding is due to the potential to encounter tribal cultural resources at depth during construction. This potential exists due to the Project Site being located in the vicinity of Centinela Creek, an unnamed Native American village in the vicinity, and the "Old Salt Road" used by Native Americans.

As with the Project, each related project would also be required to engage in AB 52 consultation with Native American tribes in order to identify any tribal cultural resources that could potentially be impacted by the related project and to address potentially significant impacts, if identified. The related projects may require mitigation similar to that applicable to the Project, especially if those related projects are in areas of heightened sensitivity similar to the Project Site.

Accordingly, in light of the Project's mitigation measures and similar anticipated mitigation requirements for Projects in areas of heightened sensitivity, the Project's contribution to cumulative impacts regarding tribal cultural resources would not be cumulatively considerable and cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts regarding tribal cultural resources were determined to be less than significant without mitigation. Therefore, no additional mitigation measures to address cumulative impacts are required.

Level of Significance after Mitigation

Cumulative impacts regarding tribal cultural resources would be less than significant without mitigation.

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CHAPTER 5
Other CEQA Considerations

This section summarizes the findings of the Draft EIR with respect to: significant unavoidable environmental impacts; reasons why the Project is being proposed, notwithstanding significant unavoidable impacts; irreversible environmental changes; growth inducing impacts; potential secondary effects related to Project mitigation measures; and effects found to be less than significant.

5.1 Significant Unavoidable Impacts

CEQA Guidelines Section 15126.2(a) requires that an EIR describe significant environmental impacts of a project on the environment. Direct and indirect significant effects shall be clearly identified and described, giving due consideration to short-term and long-term effects. As evaluated in Section 4.3, *Cultural Resources*, of this Draft EIR, and summarized below, implementation of the Project would result in significant impacts that cannot be mitigated with respect to impacts to Historic Resources.

Implementation of Mitigation Measures HIST-1 through HIST-4 would reduce the Project's impacts to historic resources, to the extent feasible. With implementation of Mitigation Measures HIST-1 through HIST-4, impacts to historic resources will be reduced through conducting a HABS-like survey to document the eligible historic buildings, providing an interpretive exhibit showcasing the history of the school, creation of a book that documents the eligible historic buildings and the history of the campus, and creating a salvage plan to retain important pieces of the school history. Since these mitigation measures capture the historical record of the resources, provide public access to that history, and preserve architectural elements, Mitigation Measures HIST-1 through HIST-4 would reduce the severity of the loss of the physical structures. Even with implementation of Mitigation Measures HIST-1 through HIST-4, the demolition of multiple eligible historic buildings would occur, and therefore, impacts would remain significant and unavoidable.

5.2 Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts

In addition to identification of the Project's significant unavoidable historic resources impact, Section 15126.2(c) of the State *CEQA Guidelines* also requires a description of the reasons why a project is being proposed, notwithstanding significant unavoidable impacts associated with a project.

The underlying purpose of the Project is to provide a modernized, code-compliant, and seismically safe Inglewood High School campus, with a combination of new and renovated buildings, new and upgraded recreational areas, and new pathways and gathering spaces throughout campus After completion of the Project, students from Morningside High School will be transferred to Inglewood High School. With the

Morningside High School students being transferred to Inglewood High School, the 1,200-student capacity, for which the school is currently designed, will not be exceeded.

The Project would modernize an existing aging campus, providing code compliant buildings that meet California Department of Education standards and the needs of current student populations. Due to the proximity to active faults, the importance of creating seismically safe classrooms and structures is paramount. In addition, the Inglewood High School campus faces unique challenges due to its proximity to the nearby Los Angeles International Airport (LAX), and the Project would address this by providing acoustical protection from the associated airplane noise. For all the reasons stated above, the Project is being proposed notwithstanding its significant unavoidable impacts.

5.3 Irreversible Environmental Changes

According to CEQA Guidelines Sections 15126(c) and 15126.2(c), an EIR is required to address any significant irreversible environmental changes that would occur should the proposed Project be implemented:

> *Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

The Project would necessarily consume limited, slowly renewable and non-renewable resources. This consumption would occur during the construction phase of the Project and would continue throughout its operational lifetime. Project development would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the Project Site. Project construction would require the consumption of resources that are non-replenishable or may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Furthermore, nonrenewable fossil fuels such as gasoline and diesel would also be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from the Project Site. As stated in Section 4.4, *Energy,* of this Draft EIR, Project construction would utilize energy for necessary on-site activities and to transport construction materials, excavated fill, and demolition debris to and from the Project Site. Project construction would implement idling restrictions, and the use of cleaner, energy-efficient equipment would result in less fuel combustion and energy consumption and thus reduce the Project's construction-related energy use.

Project operation would continue to expend nonrenewable resources that are currently consumed within the City. These include energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the Project, and the existing, finite supplies of

these natural resources would be incrementally reduced. As discussed in Section 4.4, *Energy,* of this Draft EIR, buildout of the Project would result in an increase in on-site demand for electricity, natural gas, and transportation energy (e.g., petroleum-based fuels related to vehicular travel). Electricity and natural gas usage during Project operations would be minimized through incorporation of applicable Title 24 standards, applicable CALGreen Building Code requirements. The Project would include, but would not be limited to, water-efficient landscape design, rainwater management systems, high-efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV parking spaces; bicycle facilities that would meet or exceed the respective City codes; Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; and active circulation. Per the California Energy Code Section 110.10B, the Project is required to provide at least 15 percent of the total roof area. The Project would meet this requirement and would provide the required coverage of solar ready area on building rooftops. The Project would provide 25 EV capable spaces. Therefore, while the Project would result in a net increase in energy demand, the Project would be consistent with energy efficiency policies from the City, region, and State, and would also incorporate its own energy conservation measures to reduce energy usage.

Also, as analyzed in Section 4.4, *Energy,* the Project would result in less-than-significant energy impacts due to wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's electricity and natural gas usage would be consistent with future usage projections for the region. Electricity generation capacity and supplies of natural gas as well as transportation fuels would be sufficient to meet the needs of the Project construction and operational activities. Construction of the Project would utilize fuel-efficient trucks and equipment consistent with federal and State regulations, such as fuel efficiency regulations in accordance with CARB's Pavley Phase I and II standards (at a minimum through the model year 2020 standards depending on the outcome of the SAFE Vehicles Rule court challenge), the anti-idling regulation in accordance with CCR, Title 13, Section 2485, and fuel requirements in accordance with CCR, Title 17, Section 93115, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. The Project would also comply with Title 24 standards and applicable CALGreen Building Code requirements.

In addition, the Project would be consistent with the State's Assembly Bill (AB) 32 GHG reduction target and would result in a less-than-significant impact with respect to consistency with applicable plans, policies, or regulations to reduce GHG emissions (see Section 4.6, *Greenhouse Gas Emissions*). The Project would not conflict with applicable strategies outlined in CARB's Climate Change Scoping Plan, and SCAG's 2024–2050 RTP/SCS.

Continued use of such non-renewable resources would be on a relatively small scale and consistent with regional and local growth forecasts in the area, as well as State and local goals for reductions in the consumption of such resources. Furthermore, the Project would not affect access to existing resources, nor would it interfere with the production or delivery of such resources. The Project Site is currently developed and contains no known energy resources that would be precluded from future use through Project implementation. Based on the above, the Project's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant.

5.4 Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(d) requires an EIR to discuss the ways a proposed project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth (e.g., the expansion of a wastewater treatment plant allowing more development in a service area) and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, pursuant to CEQA, growth must not be assumed as beneficial, detrimental, or of little significance to the environment.

The Project is located on land currently occupied by Inglewood High School in a highly urbanized area that is served by existing infrastructure. The Project would result in the demolition of the majority of the buildings located on the Project Site, the modernization of some of the existing buildings, and the construction of six new buildings. As discussed in Section 3, *Project Description*, of this Draft EIR, after completion of the Project, students from Morningside High School will be transferred to Inglewood High School. With the Morningside High School students being transferred to Inglewood High School, the 1,200-student capacity, for which the school is currently designed, will not be exceeded, and would not result in substantial induced population growth in the area directly through new housing and employment. Therefore, the Project would not generate growth beyond the range of development anticipated within the established SCAG regional forecast for the City. As such, the potential for physical impacts on the environment due to unplanned population, housing, and employment growth would be less than significant.

The Project would be located in proximity to existing public transit, including proximity to the Florence/La Brea Metro station, approximately 0.3 miles north of the Project Site. The Project would also be served by Los Angeles County Metro Bus Lines 115 and 211/215, as well as I-Line Shuttle. Therefore, the Project would be in an area well-served by regional and local bus lines. As such, the Project would be consistent with SCAG's 2024-2050 RTP/SCS policies for the concentration of development in proximity to transit.

The Project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure, since the Project is located in an urbanized area that is served by current infrastructure (e.g., roads and utilities), and community service facilities. Therefore, the Project would not include the construction of off-site infrastructure that would induce substantial growth and development in new areas. In addition, as further described in XV, *Public Services*, in the Project's Initial Study, the Project would not require the construction of new public services facilities that would impact the environment.

The Project's contribution to growth would also not be cumulatively considerable. As further evaluated in Section XIV, *Population and Housing*, in the Project's Initial Study (see Appendix A of this Draft EIR), related projects considered in association with the Project would be served by available infrastructure and would result in growth falling within projected growth forecasts for the City and the region.

Overall, based on the above, as the Project encompasses an existing school in a built-out, urbanized community within the range of development anticipated in regional and local plans, and as the Project Site is well served by existing infrastructure, it would not remove obstacles to growth or induce

unplanned growth beyond that associated with the Project that would require development and construction of new service facilities that would significantly affect the environment individually or cumulatively.

5.5 Secondary Effects Related to Project Mitigation Measures

CEQA Guidelines Section 15126.4(a)(1)(D) requires that if a mitigation measure proposed to address the significant effects of the Project would cause one or more significant effects in addition to those caused by the Project, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the Project. Accordingly, the mitigation measures proposed to address significant Project impacts were evaluated to determine if significant secondary impacts associated with their implementation would occur. The following provides a discussion of the subject areas in which mitigation measures are required, as well as any potential secondary significant effects that could occur as a result of their implementation. For the reasons stated below, implementation of the Project's mitigation measures would not result in significant secondary impacts.

5.5.1 Aesthetics

Mitigation Measure MM-AES-1 restricts the use of the school field and sports court lights past 10:00 pm. Since this mitigation measure places time restrictions on the use of the fields and sports courts at the campus, no further impacts would occur with its implementation. Therefore, the mitigation measure for aesthetics would not result in secondary significant impacts on the environment.

5.5.2 Air Quality

Mitigation Measure AQ-MM-1 requires the Applicant to maintain construction equipment to reduce exhaust emissions and to utilize equipment that meets USEPA Tier 4 Final off-road emissions standards or equivalent for equipment. This mitigation measure for air quality would implement emissions control strategies that would reduce impacts to less-than-significant levels. As this mitigation measure includes control strategies for different construction equipment that the District contractor would use or install, no further impacts would occur with its implementation. Therefore, the mitigation measure for air quality would not result in significant secondary impacts on the environment.

5.5.3 Cultural Resources – Archaeological and Historic Resources

Mitigation Measures HIST-1 through HIST-4 are designed to reduce the significant and unavoidable impact of demolishing historic Buildings A, I, L, and M by ensuring the documentation (HABS-like survey, book), interpretation (exhibit), and salvage of important architectural elements of the eligible historical resources. These measures focus on preserving the historical record and context of the demolished buildings and do not involve construction, ground disturbance, or physical changes to the environment that would extend beyond the already impacted Project Site. Similarly, Mitigation Measures CUL-1 through CUL-3 require standard procedures for archaeological resources, including monitoring, resource recovery, and treatment should resources be discovered during excavation. These activities are limited in scope to the specific areas of resource discovery and do not involve new or expanded

construction or physical alterations to the surrounding environment. Therefore, the implementation of Mitigation Measures HIST-1 through HIST-4 and CUL-1 through CUL-3 would not result in significant secondary impacts on the environment.

5.5.4 Geology and Soils – Paleontological Resources

Mitigation Measures GEO-1 through GEO-4 establish protections for paleontological resources through identification, treatment, and preservation of such resources should they be discovered on the Project Site. These measures include treatment and reporting of resources should they be encountered. The mitigation measures ensure that resources would be treated consistent with CEQA Guidelines and regulatory provisions for the protection of these resources. Similar to the mitigation of archaeological resources described above, the activities involved with monitoring, treatment, and reporting would not require additional disturbance on the Project Site or cause changes in the physical environment that would result in significant secondary impacts on the environment.

5.5.5 Noise

Implementation of Mitigation Measure NOI-1 would reduce construction noise through maintaining construction tools and equipment, working within the City's allowable construction hours, and installing temporary noise barriers. The maintaining of equipment and working within specified construction hours would not cause any secondary impacts. The construction barriers would be temporary, but would result in less than significant aesthetics impacts, which would be secondary and also temporary in nature. Once construction is completed, the construction noise barriers would be removed. As such, Mitigation Measure NOI-1 would not result in significant secondary impacts. Implementation of Mitigation Measure NOI-2 includes monitoring groundborne vibration, performing a photo survey for the residential structures within 20 feet of construction areas and on-site structures, and conducting a post-construction survey following completion of vibration-generating activities. Mitigation Measure NOI-2 would minimize impacts from vibration or identify where repairs need to be made due to damage caused by vibration, thus no further impacts would occur with this mitigation implementation. Implementation of Mitigation Measure NOI-3 would require scheduling of construction activities during less sensitive daytime hours. Mitigation Measure NOI-3 would restrict construction activities within 100 feet of an occupied structure to less sensitive daytime hours, thus no further impacts would occur with this mitigation implementation. Therefore, these mitigation measures for construction noise would not result in significant secondary impacts on the environment.

5.5.6 Tribal Cultural Resources

Mitigation Measure TCR-MM-1 requires retention of a Native American Monitor, the provisions of a Tribal Cultural Resources Sensitivity Training session, and Native American monitoring. Mitigation Measure TCR-MM-2 requires completion of daily monitoring logs and Mitigation Measure TCR-MM-3 provides provisions in the event of a discovery of potential tribal cultural resources. The mitigation measures ensure that resources would be treated consistent with CEQA Guidelines and regulatory provisions for the protection of these resources. The actions required for monitoring and treatment of resources if they are encountered would not require additional disturbance on the Project Site or cause changes in the physical environment that would result in significant secondary impacts on the environment.

5.6 Impacts Found Not to Be Significant

CEQA Guidelines Section 15128 states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a Project were determined not to be significant and were not discussed in detail in the Draft EIR. The Initial Study, provided in Appendix A-2 of the Draft EIR, supports findings that the Project would result in less than significant impacts related to Aesthetics (all subtopics except for lighting); Agriculture and Forestry Resources; Biological Resources; Geology and Soils (all subtopics except for paleontological resources); Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Mineral Resources; Population and Housing; Public Services; Utilities and Service Systems; and Wildfire. As such, the Initial Study concluded that these issues would not be evaluated further in the Draft EIR in accordance with CEQA Guidelines Section 15063(c)(3)(A). For further discussion of these issues and more detailed evaluation of potential impacts found not to be significant refer to the Initial Study provided in Appendix A-2 of this Draft EIR.

Aesthetics

Threshold AES-1: Substantial Adverse Effect on a Scenic Vista

A scenic vista is a public viewpoint that provides expansive views of highly valued scenery or landscapes. The City of Inglewood has not designated any scenic vistas at the Project Site, nor is the Project Site within the viewshed of any scenic vista. The Project Site consists of flat land that has been developed and operated as a school since 1905. The site consists of the existing Inglewood High School, classrooms, administrative buildings, athletic courts and fields. The Project Site does not contain any unique geologic features, major waterfalls, unique rock outcroppings, gorges, mountains, or other features that could be regarded as outstanding scenic features. The Project Site does not contain or include any scenic vistas. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Threshold AES-2: Substantial Damage to Scenic Resources within a Designated Scenic Highway

There are no designated State or County scenic highways adjacent to or in the vicinity of the Project Site. The nearest State-designated highway is SR 1 (Near Santa Monica)/Route 101 (Near El Rio), approximately 6 miles to the northwest. The nearest County-designated scenic highway is Malibu Canyon-Las Virgenes Highway, approximately 20 miles west of the Project Site. The Project Site is not visible from either of these roadways. Therefore, implementation of the Project would not affect scenic resources within a State- or County-designated scenic highway. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Threshold AES-3: In Non-Urbanized Areas, Substantially Degrade the Existing Visual Character or Quality of Public Views of the Site and its Surroundings

The Project Site is located in an urbanized area and would not conflict with applicable zoning and other regulations governing scenic quality. The General Plan Land Use designation for the Project Site is Downtown Transit Oriented District. The Downtown Transit Oriented District allows a variety of mutually complementary uses, including residential, office, retail, government and light

industrial/creative office, all in a pedestrian-friendly environment that facilitates transit usage. Per the City of Inglewood Planning and Zoning Code, the Project Site is zoned Civic Center (C-C). The C-C Zoning District allows government offices, schools and other public facilities, as well as limited private office and retail. The Project would not substantially degrade the existing visual character or quality of public views of the Project Site and its surrounding area. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Agriculture and Forestry

Threshold AG-1: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to Non-Agricultural Use

The Project Site is located in a fully urbanized area of the City of Inglewood and is currently developed and operated as Inglewood High School. According to the California Department of Conservation's Los Angeles County Important Farmland Map, the site is designated as "Urban and Built-Up Land" and does not include any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Project would not result in the conversion of any such designated farmland to non-agricultural use. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Threshold AG-2: Conflict with Existing Zoning for Agricultural Use or a Williamson Act Contract

The Project Site is designated and zoned as Civic Center (C-C) and is located within the City's Downtown Transit Oriented District. This zoning designation does not permit agricultural uses, and the Project Site does not contain or adjoin any land subject to a Williamson Act contract. Therefore, implementation of the Project would not conflict with agricultural zoning or a Williamson Act contract. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Threshold AG-3: Conflict with Existing Zoning for, or Cause Rezoning of, Forest Land or Timberland

The Project Site is in a developed urban setting and is not zoned for forest land, timberland, or Timberland Production. The Civic Center (C-C) zoning designation applicable to the site does not include or permit such land uses. Therefore, the Project would not conflict with existing zoning for, or result in rezoning of, forest land or timberland. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Threshold AG-4: Result in the Loss of Forest Land or Conversion of Forest Land to Non-Forest Use

No forest land exists on or near the Project Site, which is fully developed as a public high school. The Project would not result in the loss or conversion of any forest land. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Threshold AG-5: Involve Other Changes in the Existing Environment that Could Result in the Conversion of Farmland or Forest Land

The Project would not involve land acquisition, expansion into undeveloped areas, or infrastructure improvements that would affect off-site land. Given its location in a fully urbanized setting with no nearby farmland or forest land, the Project would not cause any changes that could indirectly lead to the conversion of agricultural or forest land. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Biological Resources

Threshold BIO-1: Substantial Adverse Effect on Special-Status Species

The Project Site is fully developed with school facilities and associated landscaping and lacks native vegetation or natural habitat. Existing trees and ornamental vegetation may offer limited nesting habitat for migratory birds and raptors protected under the federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code. Construction activities that include vegetation removal could potentially impact active nests during the avian breeding season. However, compliance with applicable State and federal regulations, including pre-construction nesting bird surveys and implementation of avoidance measures, would ensure that impacts are less than significant. If Project construction is necessary during the bird breeding season, a qualified biologist with experience in conducting breeding bird surveys will conduct a nesting bird and raptor survey within three days prior to work in the area. If an active nest is identified, a buffer will be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer should be delineated by temporary fencing and remain in effect as long as construction is occurring. No Project construction will occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the Project. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors. Therefore, impacts on candidate, sensitive, or special-status species would be less than significant, and this issue is not evaluated further in this EIR.

Threshold BIO-2: Substantial Adverse Effect on Riparian Habitat or Other Sensitive Natural Communities

The Project Site consists of developed land and landscaped areas associated with an active high school campus. No riparian habitat or sensitive natural communities occur on or adjacent to the site. Therefore, the Project would not result in direct or indirect impacts to such resources. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Threshold BIO-3: Substantial Adverse Effect on State or Federally Protected Wetlands

No wetlands, including jurisdictional features regulated under federal or state law, are present on or near the Project Site. The entire Project would be confined to a previously developed urban school campus. Therefore, the Project would not result in the removal, filling, or hydrological modification of any wetlands. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Threshold BIO-4: Interfere with Wildlife Movement or Nursery Sites

The Project Site is located in a fully urbanized area and is enclosed by existing buildings and fencing. The surrounding area is developed with commercial and residential uses, and there are no natural corridors or water bodies that support fish or wildlife movement. As such, the Project Site does not function as a migratory corridor or wildlife nursery site. Therefore, implementation of the Project would not interfere with wildlife movement or impede use of nursery sites. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Threshold BIO-5: Conflict with Local Policies or Ordinances Protecting Biological Resources

Tree removal required for Project construction would include the removal of 26 trees, some of which may be protected under the City of Inglewood's Tree Preservation Ordinance. The Project would comply with applicable local policies and ordinances by securing required permits and replacing any protected trees in accordance with City standards. The Project also includes a planting plan to install ornamental trees as well as native plants throughout the site. Therefore, the Project would not conflict with local biological resource policies or ordinances, and impacts would be less than significant. This issue is not evaluated further in this EIR.

Threshold BIO-6: Conflict with a Habitat Conservation Plan or Similar Plan

The Project Site is not located within the boundaries of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or similar plan. Therefore, implementation of the Project would not conflict with any such plans. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Geology and Soils

Threshold GEO-1(a.i): Exposure to Rupture of a Known Earthquake Fault

Portions of the Project Site are located within the Newport-Inglewood-Rose Canyon Fault Zone, as designated on the most recent Alquist-Priolo Earthquake Fault Zoning Map. However, based on a site-specific Fault Investigation and Geotechnical Investigation Report, the Project will be designed to avoid surface fault rupture hazards, consistent with regulatory setbacks and current seismic design standards.

Compliance with the California Building Code (CBC), Division of the State Architect (DSA) review, and adherence to project-specific geotechnical recommendations would ensure that the potential for damage due to fault rupture is reduced to acceptable levels. Therefore, impacts related to fault rupture would be less than significant, and this issue is not evaluated further in this EIR.

Threshold GEO-1(a.ii): Exposure to Strong Seismic Ground Shaking

The Project Site, like all of Southern California, is subject to strong ground shaking due to regional seismic activity. However, Project design and construction would be reviewed and approved by DSA and would comply with all seismic-safety development standards under Title 24 of the California Code of Regulations and the CBC, including the Earthquake Design Regulations of Chapter 16A. With adherence to the seismic design parameters and site-specific recommendations in the Geotechnical and Fault Investigation Reports, the potential for substantial adverse effects from strong seismic shaking would be minimized. Therefore, impacts would be less than significant, and this issue is not evaluated further in this EIR.

Threshold GEO-1(a.iii): Seismic-Related Ground Failure, Including Liquefaction

Based on the Geotechnical Investigation Report, found in Appendix A-2 of the Initial Study, the Project Site is not located in a mapped liquefaction hazard zone and exhibits a low potential for liquefaction and related settlement. In addition, differential seismic settlement is expected to be minimal and within tolerable design thresholds. All proposed structures would be designed in accordance with the recommendations in the Geotechnical Investigation to accommodate minor ground settlement. Therefore, impacts related to liquefaction and seismic-related ground failure would be less than significant, and this issue is not evaluated further in this EIR.

Threshold GEO-1(a.iv): Landslides

The Project Site is located on generally flat terrain and is not within a designated Landslide Hazard Zone, according to the California Geological Survey. No historical or geologic evidence of landsliding was identified during field investigations, and the risk of landslides at the Project Site is considered negligible. Therefore, no impact related to landslides would occur, and this issue is not evaluated further in this EIR.

Threshold GEO-2: Soil Erosion or Loss of Topsoil

Project construction would involve minor grading and excavation on a previously developed and graded site, limiting the potential for soil erosion. During construction, erosion control best management practices (BMPs) would be implemented through a Storm Water Pollution Prevention Plan (SWPPP) as required under the Construction General Permit. Upon completion, the site would be covered by buildings, hardscape, and landscaping, substantially reducing erosion potential. Therefore, soil erosion and topsoil loss impacts would be less than significant, and this issue is not evaluated further in this EIR.

Threshold GEO-3: Unstable Soils

The Project Site is not underlain by unstable soils that would lead to substantial risk of landslides, lateral spreading, subsidence, or collapse. The Geotechnical Investigation Report confirms the soils are stable and suitable for development with standard engineering practices and the incorporation of design measures such as proper drainage and retaining wall systems. Compliance with the recommendations of the geotechnical investigation and applicable CBC standards would ensure that soil-related instability does not result in significant on- or off-site impacts. Therefore, impacts would be less than significant, and this issue is not evaluated further in this EIR.

Threshold GEO-4: Expansive Soils

The on-site soils were found to be non-expansive, reducing the likelihood of shrink-swell behavior that could damage building foundations or hardscape. Nonetheless, project design will incorporate minor drainage and compaction measures per geotechnical recommendations to eliminate any residual risks. With adherence to design requirements reviewed and approved by DSA, potential impacts associated with expansive soils would be less than significant, and this issue is not evaluated further in this EIR.

Threshold GEO-5: Soils Unsuitable for Septic Systems

The Project will not utilize septic tanks or alternative wastewater disposal systems, as it will remain connected to the existing municipal sewer infrastructure. Therefore, no impact related to unsuitable soils for septic systems would occur, and this issue is not evaluated further in this EIR.

Hazards and Hazardous Materials

Threshold HAZ-1: Create a Significant Hazard to the Public or the Environment Through the Routine Transport, Use, or Disposal of Hazardous Materials

Project construction would involve the limited use of hazardous materials typical of construction activities (e.g., fuels, solvents, paints). The District will comply with the requirements of Education Code (EDC), §17210, §17213.1, and §17213.2, and the Phase I ESA was included in the NOP documentation for agency review. Demolition activities could encounter asbestos-containing building materials (ACBMs), lead-based paint, and small quantities of polychlorinated biphenyls (PCBs) from existing transformers. These materials would be handled, transported, and disposed of in accordance with applicable federal, State, and local regulations, including Cal/OSHA and the California Code of Regulations Title 22. Licensed abatement contractors would be used for removal, and all hazardous waste would be properly managed and disposed of at permitted facilities. During construction, all imported soil/fill material will be tested to assess any contaminants of concern meet screening levels. To minimize the possibility of introducing contaminated soil/fill material, there will be documentation of the origins of the soil/fill material and, if applicable, sampling be conducted to ensure that the imported soil/fill material are suitable for the intended land use. The soil sampling will include analysis based on the source of the

soil/fill and knowledge of prior land use. During operation, hazardous material use would be limited to routine cleaning and maintenance products, similar to existing conditions. Accordingly, the Project would not create a significant hazard to the public or the environment. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

Threshold 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

The Project Site is located near historic oil wells and a closed leaking underground storage tank (LUST) site, but regulatory records confirm no active contamination issues affecting the site. Hazardous building materials removed during demolition could pose a release risk; however, compliance with existing regulatory requirements, including licensed abatement, operations and maintenance programs for asbestos-containing materials, and hazardous waste handling protocols, would minimize risks. Any accidental release would be addressed under oversight of USEPA, Cal/OSHA, and the Department of Toxic Substances Control (DTSC). Operation of the Project would not increase the use of hazardous materials beyond current levels. Therefore, impacts would be less than significant, and this issue will not be further evaluated in the EIR.

Threshold 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

The Project Site itself is an existing school campus. While construction would involve handling of hazardous materials (e.g., ACBMs, lead-based paint), all activities would be conducted in compliance with State and federal regulations, including the recommendations of the Phase I ESA, provided in Appendix B of the Initial Study. Operation of the Project would continue to involve only routine custodial and maintenance supplies. Accordingly, the Project would not emit hazardous emissions or improperly handle hazardous materials in proximity to a school. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

Threshold 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, Create a Significant Hazard to the Public or the Environment

The Project Site is identified in the DTSC EnviroStor database as a School Investigation site, with historic potential contaminants including lead and diesel fuel. However, the site is not on the Cortese List of hazardous waste sites, and no active cleanup actions are required. A regulatory database search identified 32 Cortese sites within one mile of the Project, but none poses a direct hazard to the Project Site. Any removal of ACBMs and lead-based paint would occur under existing regulatory standards. Therefore, the Project would not result in a significant hazard due to its listing status. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

Threshold 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, Result in a Safety Hazard or Excessive Noise for People Residing or Working in the Project Area

The Project Site is located approximately 3.0 miles east of Los Angeles International Airport (LAX) and 3.1 miles north of Hawthorne Municipal Airport. The site is outside of the Hawthorne Airport Influence Area but within the LAX noise contour area. According to the Los Angeles County Airport Land Use Plan, schools are a compatible use within the 60–65 CNEL noise range. Because the Project would modernize existing facilities without adding new students or staff, it would not expose additional people to excessive noise or safety hazards from airport operations. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

Threshold HAZ-6: Impair Implementation of or Physically Interfere With an Adopted Emergency Response Plan or Emergency Evacuation Plan

Construction could result in temporary lane or sidewalk closures, but emergency vehicle access would be maintained at all times, consistent with Caltrans traffic control requirements. During operation, the Project would not alter major roadways or designated disaster routes. Circulation improvements on campus would improve emergency access and parking. Accordingly, the Project would not impair emergency response or evacuation plans. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

Threshold HAZ-7: Expose People or Structures, Either Directly or Indirectly, to a Significant Risk of Loss, Injury, or Death Involving Wildland Fires

The Project Site is located in a fully urbanized area of Inglewood and is not within a Very High Fire Hazard Severity Zone as designated by CAL FIRE. No wildland fire risk exists at the site. Therefore, the Project would not expose people or structures to wildland fire hazards. No impact would occur, and this issue will not be further evaluated in the EIR.

Hydrology and Water Quality

Threshold HYD-1: Violate Water Quality Standards or Waste Discharge Requirements

Construction of the Project would comply with the State Water Resources Control Board's Construction General Permit, including preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of best management practices (BMPs) to control erosion, sedimentation, and hazardous materials. During operation, stormwater would be managed through a combination of low-impact development (LID) features, including biofiltration planters, dry wells, and an underground detention tank, in compliance with Los Angeles County standards. These measures would ensure that stormwater quality is protected, and surface water and groundwater quality are not degraded. Thus, impacts would be less than significant, and this issue is not evaluated further in this EIR.

Threshold HYD-2: Substantially Decrease Groundwater Supplies or Interfere with Groundwater Recharge

The Project does not propose the use of groundwater, and maximum excavation would extend to 11.5 feet below ground surface, well above the historic high groundwater level (greater than 50 feet deep). The Project would maintain approximately 182,400 square feet of pervious surfaces and provide drainage improvements that allow for infiltration. Therefore, the Project would not substantially decrease groundwater supplies or interfere with groundwater recharge. Thus, impacts would be less than significant, and this issue is not evaluated further in this EIR.

Threshold HYD-3a: Substantially Alter Drainage Patterns Resulting in Erosion or Siltation

Construction activities would temporarily disturb soils, but erosion and sedimentation would be minimized through compliance with SWPPP requirements and construction BMPs. No streams or rivers occur on or near the Project Site that could be affected. As such, the Project would not substantially alter drainage patterns in a way that would result in significant erosion or siltation. Thus, impacts would be less than significant, and this issue is not evaluated further in this EIR.

Threshold HYD-3b: Substantially Alter Drainage Patterns Resulting in Flooding

Grading and construction would temporarily alter site drainage; however, BMPs would be implemented to control runoff and prevent localized flooding. Following construction, site elevations would remain similar to existing conditions, and drainage would be managed by the Project's stormwater improvements, including dry wells, catch basins, and biofiltration planters designed to treat the 85th percentile storm event. Therefore, the Project would not substantially increase flooding risk on- or off-site. Thus, impacts would be less than significant, and this issue is not evaluated further in this EIR.

Threshold HYD-3c: Substantially Alter Drainage Patterns that Exceed Drainage System Capacity or Provide Polluted Runoff

The Project would include new stormwater improvements that retain and treat runoff on-site before discharging to the existing storm drain system. The Project would retain 100 percent of stormwater from the design storm event through infiltration and detention systems, ensuring flows do not exceed storm drain capacity. BMPs would also ensure that stormwater runoff is treated for water quality prior to entering the storm drain system. Therefore, the Project would not exceed the capacity of drainage systems or provide substantial additional sources of polluted runoff. Thus, impacts would be less than significant, and this issue is not evaluated further in this EIR.

Threshold HYD-3d: Impede or Redirect Flood Flows

The Project Site is not located within a 100-year floodplain as mapped by the Federal Emergency Management Agency (FEMA), and no streams or rivers occur on or adjacent to the Project Site. As such, the Project would not impede or redirect flood flows. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Threshold HYD-4: Risk of Release of Pollutants Due to Project Inundation

The Project Site is located outside of tsunami hazard zones, seiche hazard zones, and mapped 100-year flood hazard areas. Therefore, there is no potential for inundation that could release pollutants into the environment. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Threshold HYD-5: Conflict with a Water Quality Control Plan or Sustainable Groundwater Management Plan

The Project would comply with all applicable stormwater regulations and incorporate LID features that ensure on-site infiltration and treatment of stormwater. Because the Project would not use groundwater and would not interfere with groundwater recharge or water quality standards, it would not conflict with a water quality control plan or a groundwater management plan. Thus, impacts would be less than significant, and this issue is not evaluated further in this EIR.

Land Use and Planning

Threshold LU-1: Physically Divide an Established Community

The Project involves renovation and replacement of facilities on the existing Inglewood High School campus. All construction and operation would occur within the current school boundary, and the campus would continue to operate as a high school. Because no new roadways, barriers, or other features would be introduced that could separate or disrupt existing neighborhoods, the Project would not physically divide an established community. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Threshold LU-2: Conflict with an Applicable Land Use Plan, Policy, or Regulation

The Project is consistent with the City of Inglewood's General Plan land use designation of Civic Center (C-C), which permits schools and other public facilities. In addition, school facilities are exempt from local zoning ordinances pursuant to California Government Code Section 53094. The Project would not change the use of the site, would not conflict with adjacent land uses, and would not be subject to any habitat conservation or natural community conservation plans. Therefore, the Project would not cause a

significant environmental impact due to a conflict with an adopted plan, policy, or regulation. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Mineral Resources

Thresholds MR-1 and MR-2: Loss of Availability of a Known Mineral Resource or Locally Important Mineral Resource Recovery Site

The Project Site is not located within Mineral Resource Zone (MRZ) 2, where significant mineral resources are present or likely to occur. The site has not been designated in a general plan, specific plan, or other land use plan as a locally important mineral resource recovery area. The Project involves demolition, renovation, and construction of school facilities on an existing high school campus, and no mineral extraction or mining activities occur on the site. Therefore, implementation of the Project would not result in the loss of availability of a known mineral resource of regional or statewide value, nor the loss of a locally important mineral resource recovery site. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Population and Housing

Threshold PH-1: Induce Substantial Unplanned Population Growth

The Project involves modernization and replacement of facilities on the existing Inglewood High School campus. It would not introduce new homes or businesses, nor extend public roads or other infrastructure beyond the campus boundaries. Planned utility upgrades would replace existing systems and connect to existing mainlines rather than expand service capacity. In addition, declining enrollment at Inglewood High School allows the campus to accommodate anticipated students, including the relocation of students from Morningside High School, without expanding capacity or staffing. Therefore, the Project would not induce direct or indirect population growth. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Threshold PH-2: Displace Substantial Numbers of People or Housing

The Project Site consists solely of an existing high school campus within a developed urban area and contains no housing units. Accordingly, Project implementation would not displace existing residences or people and would not necessitate the construction of replacement housing elsewhere. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Public Services

Threshold PS-1a: Result in Substantial Adverse Physical Impacts Associated With the Provision of New or Physically Altered Government Facilities, the Need for New or Physically Altered Government Facilities, the Construction of Which Could Cause Significant Environmental Impacts, in Order to Maintain Acceptable Service Ratios, Response Times, or Other Performance Objectives for Fire Protection Services

The Project would modernize the existing Inglewood High School campus and would not increase the overall student or staff capacity beyond the school's planned enrollment of 1,200 students. Although students from Morningside High School would be transferred to Inglewood High School, this transfer would occur within existing capacity and would not induce population growth that could increase demand for fire protection services. The Project Site is already served by the Los Angeles County Fire Department, with Station 171 located approximately 0.3 mile away, and would continue to be equipped with sprinkler systems, extinguishers, and required fire access. Planned improvements include new fire lane access, which would enhance emergency response. As a result, the Project would not create substantial adverse physical impacts associated with fire protection. Impacts would be less than significant, and this issue is not evaluated further in this EIR.

Threshold PS-1b: Result in Substantial Adverse Physical Impacts Associated With the Provision of New or Physically Altered Government Facilities, the Need for New or Physically Altered Government Facilities, the Construction of Which Could Cause Significant Environmental Impacts, in Order to Maintain Acceptable Service Ratios, Response Times, or Other Performance Objectives for Police Protection Services

Police protection services for the Project Site are currently provided by the Inglewood Police Department, with the nearest station located 0.2 mile from campus. The Project would replace outdated facilities but would not increase student or staff capacity. The transfer of students from Morningside High School represents a shift in service demand within the City rather than a net increase. School site safety personnel and existing joint use agreements for after-hours events would continue under the Project. Temporary construction jobs would be filled locally and would not induce population growth requiring additional law enforcement services. Therefore, impacts on police protection would be less than significant, and no further analysis is required in this EIR.

Threshold PS-1c: Result in Substantial Adverse Physical Impacts Associated With the Provision of New or Physically Altered Government Facilities, the Need for New or Physically Altered Government Facilities, the Construction of Which Could Cause Significant Environmental Impacts, in Order to Maintain Acceptable Service Ratios, Response Times, or Other Performance Objectives for Schools

The Project involves modernization of Inglewood High School facilities and would not result in increased enrollment or staffing beyond existing capacity. Construction jobs generated by the Project would be temporary and filled by the local labor force, meaning no new demand for schools would be created. Accordingly, the Project would not require the construction of new or expanded school facilities. No impacts would occur, and this issue is not evaluated further in this EIR.

Threshold PS-1d: Result in Substantial Adverse Physical Impacts Associated With the Provision of New or Physically Altered Government Facilities, the Need for New or Physically Altered Government Facilities, the Construction of Which Could Cause Significant Environmental Impacts, in Order to Maintain Acceptable Service Ratios, Response Times, or Other Performance Objectives for Parks

While construction would temporarily limit use of certain recreational facilities on campus, the school does not serve as a public park relied upon by the City of Inglewood. Further, the Project includes development of new recreational amenities such as tennis courts, basketball courts, and a practice field, improving opportunities available to students. Because the Project does not increase student capacity and does not induce population growth, it would not create a need for new or expanded park facilities. Impacts would be less than significant, and no further evaluation is required in this EIR.

Threshold PS-1e: Result in Substantial Adverse Physical Impacts Associated With the Provision of New or Physically Altered Government Facilities, the Need for New or Physically Altered Government Facilities, the Construction of Which Could Cause Significant Environmental Impacts, in Order to Maintain Acceptable Service Ratios, Response Times, or Other Performance Objectives for Other Public Facilities

The Project would not increase student or staff capacity at the site and therefore would not result in new or expanded demand for other public facilities such as libraries or community centers. Accordingly, no impacts would occur, and this issue is not evaluated further in this EIR.

Utilities and Service Systems

Threshold U-1: Require or Result in the Relocation or Construction of New or Expanded Water, Wastewater, Storm Drainage, Electric Power, Natural Gas, or Telecommunications Facilities, the Construction or Relocation of Which Could Cause Significant Environmental Effects

The Project would modernize the existing Inglewood High School campus without increasing student enrollment beyond the existing design capacity of 1,200 students. Construction water demand would be temporary and minimal, while operational water use would remain consistent with existing capacity. The Project would install upgraded domestic and fire water systems and new sewer pipelines, but these would connect to existing mainlines and would not require new or expanded off-site facilities. Wastewater generated by the Project would be conveyed to the Los Angeles County Sanitation Districts' A.K. Warren Water Resource Facility, which has sufficient available capacity. Stormwater would be managed through new on-site drainage improvements tied into the existing storm drain system. Electricity and natural gas services are available on-site through Southern California Edison and SoCalGas, and the Project would incorporate energy-efficient design features such as solar photovoltaic systems and compliance with CALGreen standards. Telecommunications services are also available, with installation of new on-site fiber optic and communication systems limited to trenching and minor off-site connections. Accordingly, the Project would not require new or expanded utility infrastructure beyond existing regional service capacities. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

Threshold U-2: Have Sufficient Water Supplies Available to Serve the Project and Reasonably Foreseeable Future Development During Normal, Dry, and Multiple Dry Years

The City of Inglewood, as a member agency of the West Basin Municipal Water District, has sufficient supplies identified in its 2020 Urban Water Management Plan to serve the Project under normal, dry, and multiple dry years. Because the Project would not result in net new students or increased capacity, water demand would remain consistent with existing conditions. Sufficient water supplies are therefore available, and impacts would be less than significant. This issue will not be further evaluated in the EIR.

Threshold U-3: Result in a Determination by the Wastewater Treatment Provider That Serves the Project That It Has Adequate Capacity to Serve the Project's Projected Demand in Addition to the Provider's Existing Commitments

Wastewater from the Project would continue to be treated at the A.K. Warren Water Resource Facility, which has an available treatment capacity of approximately 154 million gallons per day. Because the Project would not increase student capacity or staffing beyond existing levels, it would not generate wastewater in excess of the facility's available capacity. Therefore, the Project would not result in inadequate wastewater treatment services. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

Threshold U-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

Construction activities would generate demolition and construction debris, which would be disposed of at the Sunshine Canyon Landfill, a regional facility with sufficient permitted capacity to accommodate the Project's disposal needs. Operational solid waste generation would remain consistent with existing levels, estimated at approximately 600 pounds per day, due to the relocation of students from Morningside High School without increasing overall enrollment capacity. This level of waste represents a negligible fraction of remaining landfill capacity in Los Angeles County and would not impair the attainment of solid waste reduction goals. Accordingly, impacts would be less than significant, and this issue will not be further evaluated in the EIR.

Threshold U-5: Comply With Federal, State, and Local Management and Reduction Statutes and Regulations Related to Solid Waste

The Project would comply with all applicable federal, State, and local statutes and regulations related to solid waste management. Construction contractors would be required to divert at least 65 percent of nonhazardous construction and demolition debris pursuant to CALGreen Section 5.408. Operational waste collection and disposal would continue through existing City waste haulers and facilities, with no significant increase in generation compared to existing conditions. As a result, the Project would not

conflict with applicable solid waste regulations. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

Wildfire

Threshold W-1: Substantially Impair an Adopted Emergency Response Plan or Emergency Evacuation Plan

The Project Site is within a developed urbanized area and is not located in a wildland fire hazard zone. According to CAL FIRE Very High Fire Hazard Severity Zone maps, the Project Site is not designated as a fire hazard area. During construction, access may be temporarily altered, but contract specifications would ensure emergency vehicle access is maintained. The Project Site is not located on a designated Disaster Route. Upon completion, emergency access would improve with new fire lane connections designed in compliance with Los Angeles County Fire Department (LACFD) requirements. Therefore, the Project would not impair an adopted emergency response or evacuation plan, impacts would be less than significant, and this issue will not be further evaluated in the EIR.

Threshold W-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

The Project Site is relatively flat, with only about six feet of grade change, and is not located in or near a designated wildland fire hazard zone. While construction would involve use of flammable materials such as fuels, their handling would comply with applicable safety regulations. In addition, the Project would be reviewed for compliance with the California Fire Code and Division of the State Architect (DSA) requirements. Following construction, the site would continue to operate as a high school with no change to wildfire risk exposure. Therefore, the Project would not exacerbate wildfire risks or expose occupants to wildfire-related pollutants, impacts would be less than significant, and this issue will not be further evaluated in the EIR.

Threshold W-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 Risk or That May Result in Temporary or Ongoing Impacts to the Environment

The Project would install upgraded on-site infrastructure, including sewer pipelines and new domestic and fire water systems, but these would connect to existing mainlines. The Project Site is already served by existing roads, power, and water infrastructure within the surrounding urban area. No additional off-site infrastructure would be needed. Therefore, the Project would not create or expand infrastructure in a way that could exacerbate fire risks or cause additional environmental impacts, impacts would be less than significant, and this issue will not be further evaluated in the EIR.

Threshold W-4: 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

The Project Site slopes gently from northeast to southwest but is not a hillside area and is not subject to landslide hazards. It is also outside of mapped flood hazard zones. Project improvements would comply with the California Building Code and California Fire Code, and drainage patterns would be managed through best management practices (BMPs) that minimize runoff and direct stormwater away from buildings. As such, the Project would not expose people or structures to flooding, landslides, or post-fire slope instability risks. Therefore, impacts would be less than significant, and this issue will not be further evaluated in the EIR.

CHAPTER 6
Alternatives

6.1 Introduction and Overview

CEQA requires that an EIR describe a range of reasonable alternatives to the Project, or to the location of the Project, which could feasibly avoid or lessen any significant environmental impacts while substantially attaining the basic objectives of the Project. An EIR should also evaluate the comparative merits of the alternatives. This chapter describes potential alternatives to the Project that were considered, identifies alternatives that were eliminated from further consideration and reasons for dismissal, and analyzes available alternatives in comparison to the potential environmental impacts associated with the Project.

Key provisions of the CEQA Guidelines (§15126.6) pertaining to the alternatives analysis are summarized below:

- The discussion of alternatives shall focus on alternatives to the Project or its location that are capable of avoiding or substantially lessening any significant effects of the Project, even if these alternatives would impede to some degree the attainment of the Project objectives or would be more costly.
- The No Project Alternative shall be evaluated along with its impact. The No Project analysis shall discuss the existing conditions at the time the Notice of Preparation is published. Additionally, the analysis shall discuss what would be reasonably expected to occur in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a "rule of reason"; therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. Alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the Project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the Project need to be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The range of feasible alternatives is selected and discussed in a manner to foster meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitation, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative

site. An EIR need not consider an alternative whose effects cannot be reasonably identified, whose implementation is remote or speculative, or that would not achieve the basic Project objectives.

6.2 Project Objectives

Since the existing campus is aged and in need of upgrades, the underlying purpose of the Project is to provide a modernized and seismically safe Inglewood High School campus, with a combination of new and renovated buildings, new and upgraded recreational areas, and new pathways and gathering spaces throughout campus. As further required by the CEQA Guidelines, the specific objectives of the Project are provided below:

1. Meet the needs of District students through the development of classrooms that are clean, safe, and well-equipped to allow for effective teaching and learning.
2. Reconstruct the existing Inglewood High School campus to provide a modernized campus, as well as a comfortable and safe environment, that benefits both students and staff.
3. Construct new buildings that bring the campus up to code (Educational Code, Building Code, etc.) to provide safety and security, including meeting ADA accessibility requirements and acoustically protecting classrooms from exterior noise sources, including the nearby Los Angeles International (LAX) airport flight path.
4. Renovate existing buildings to provide a cohesive look throughout the campus.
5. Provide and connect gathering spaces on campus, including provision of shade.
6. Provide upgraded sports facilities to accommodate sports practices, school events, and recreational facilities for public use.
7. Integrate the campus into the adjacent urban fabric, to serve as a resource for the community.

6.3 Alternatives Considered but Rejected

Pursuant to CEQA Guidelines Section 15126.6(c), the alternatives that were considered but rejected are briefly discussed below. An alternative may be considered but not carried forward for various reasons, such as not meeting the objective(s) of the Project; not being feasible; conditions outside the control of the Project applicant (e.g., land ownership, right-of-way acquisition); or other constraints.

A range of alternatives that are “reasonable” for analysis have been defined by the District and are discussed below in Section 6.4, Alternatives Selected for Further Analysis. The following section describes alternatives or alternative concepts that were given consideration but rejected from further analysis in the EIR due to their infeasibility.

6.3.1 Relocation of Combination Fields

This alternative proposes the placement of the new buildings in a configuration on the Project Site that allows the combination field to be sited towards the center of campus. All other aspects of the Project, including construction activities and intensity, and operational characteristics, are assumed to be comparable to those of the Project. The alternative would require complete reconfiguration of the campus

buildings and walkways such that buildings would be on the edges of the campus with the recreational features in the center of campus. In addition, with reconfiguration, multiple project objectives, including providing and connecting gathering spaces throughout the campus, would not be achieved. Although this alternative would reduce potentially significant lighting impacts on the western side of campus, it would not address the one significant and unavoidable impact on historical resources. Therefore, this alternative was not carried forward for further analysis.

6.3.2 Alternative Project Location for Athletic Fields/Recreation Activities

This alternative proposes relocating the athletic field and recreational fields to a new offsite location. Developing an entirely new site could result in new or more severe significant impacts than have been identified for the Project. Establishing new athletic fields with installed lighting is unlikely to have fewer or less significant environmental impacts than the Project, unless they are located far from existing residential development and can avoid potentially significant lighting effects. However, locating new athletic fields at a distance from existing residential development could also have the effect of increasing travel distances to the athletic and recreational facilities and associated criteria air pollutant and greenhouse gas emissions. The Applicant would also be required to obtain control of a new site that is of sufficient size to accommodate new fields. In addition, if a new site is not available within a reasonable distance of Inglewood High School and its enrolled population, a majority of the Project objectives, including integrating the campus into the adjacent the urban fabric, would not be attained. For these reasons, this alternative was rejected from further consideration.

6.4 Alternatives Selected for Further Analysis

Based on the criteria listed in Section 6.1, the following four alternatives have been determined to represent a reasonable range of other options that would meet the majority of the objectives of the Project, and which may avoid or substantially reduce significant effects associated with the Project. See Table 6-1 *Comparison of Project Alternative Impacts*.

The following alternatives are assessed below:

- Alternative 1 - No Project
- Alternative 2 - Full Preservation of Historic Buildings
- Alternative 3 - Partial Preservation of Historic Buildings (Building I)
- Alternative 4 - Expanded Partial Preservation of Historic Buildings (Buildings I, L, and M)

In addition, per CEQA Guidelines Section 15126.6(e)(2), an EIR must identify an “environmentally superior” alternative. Where the No Project Alternative is identified as environmentally superior, the EIR must identify an environmentally superior alternative from among the other evaluated alternatives. Each alternative’s environmental impacts are compared with the Project's and determined to be environmentally superior, neutral, or inferior. Section 6.5 identifies the Environmentally Superior Alternative. The preferred land use alternative (Project) is analyzed in detail in Chapter 4 of this EIR.

6.4.1 Alternative 1 - No Project Alternative

CEQA Guidelines Section 15126.6 [e] requires an analysis of a No Project Alternative. The purpose of this alternative is to describe and analyze a scenario under which the Project is not implemented so that decision makers can compare the impacts of approving the Project with the impacts of not approving the Project. The No Project Alternative analysis must discuss the existing site conditions as well as what would reasonably be expected to occur in the foreseeable future based on any current plans, and it must be consistent with available infrastructure and community services.

Under the No Project Alternative, the Project Site would not be developed with the proposed improvements, and the existing facilities would remain. Use of the existing facilities, as they are currently, would also remain the same, with no demolition of existing buildings, no construction of new buildings or sports facilities, and no new lighting installed. Students would continue to use the aging facilities, some of which are not code compliant.

Aesthetics - Lighting

Under this alternative, existing facilities would remain as is. As a result, there would be no impacts to visual/aesthetics resources because no new physical development would occur. This alternative would not demolish or renovate any of the existing buildings, and would not upgrade school recreational facilities, including the installation of field and sports courts lighting. As such, this alternative would not create new sources of light and glare that could lead to adverse impacts related to light and glare. Therefore, this alternative would eliminate the Project's potentially significant lighting impacts, no mitigation measures would be required, and no impact would occur. The No Project Alternative would have reduced impacts as compared to the Project as it relates to aesthetics (lighting).

Air Quality

Under this alternative, no construction or new operational activities would occur. As noted in Chapter 4.2, the results of the HRA concluded that construction activities would result in toxic air contaminant levels that, if left unmitigated, would result in a significant cancer risk level for residential land uses that exceeds the SCAQMD significance threshold. This is due to the construction phase of the Project having the potential to generate temporary regional criteria pollutant emissions through the use of heavy-duty construction equipment, such as backhoes and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and through building activities such as the application of paint and other surface coatings. As the No Project Alternative would not include a construction phase, no new emissions would be generated that would have the potential to impact air quality. Therefore, this alternative would eliminate the Project's potentially significant air quality impacts, as no impact would occur and no mitigation measures would be required. The No Project Alternative would have reduced impacts as compared to the Project as it relates to air quality.

Cultural Resources

As the No Project Alternative would not include construction activities, no ground disturbing activities would occur under this alternative, and thus, impacts related to the potential to encounter subsurface unanticipated archaeological resources would be reduced as compared to the Project. In addition, as the No Project Alternative would not result in the demolition of eligible historic buildings, this alternative

would eliminate the Project's unavoidable and significant impact on historical resources, since no impact would occur and no mitigation measures would be required. The No Project Alternative would have reduced effects as compared to the Project as it relates to cultural resources.

Energy

As the No Project Alternative would not result in any changes to the existing condition, no construction or new operational activities would occur under this alternative, and therefore, no new energy consumption would result. Therefore, this alternative would result in no energy impacts. The No Project Alternative would have reduced impacts as compared to the Project as it relates to construction energy usage. However, since the Project would have more energy efficient buildings, the No Project Alternative would have slightly greater impacts as compared to the Project as it relates to operational energy usage.

Geology and Soils - Paleontological Resources

As the No Project Alternative would not include construction activities, no ground disturbing activities would occur under this alternative and impacts related to the potential to encounter subsurface unanticipated paleontological resources would be reduced as compared to the Project. This alternative would eliminate the Project's significant paleontological resources impacts, and no mitigation measures would be required. The No Project Alternative would have no impacts related to paleontological resources.

Greenhouse Gas Emissions

As the No Project Alternative would not result in any changes to the existing condition, no construction or new operational activities would occur under this alternative, and therefore, no new GHG emissions would be generated. This alternative would eliminate the Project's less than significant impacts. The No Project Alternative would result in no impacts as it relates to GHG emissions.

Noise

As the No Project Alternative would not include construction activities, no noise-generating construction activities would occur under this alternative and impacts related to substantial noise generation would be reduced as compared to the Project. As noted in Chapter 4.7, Project construction would result in temporary increases in ambient noise that would meet or exceed the thresholds of significance at nearby noise sensitive receptors, construction noise impacts would be potentially significant, and mitigation measures would be required. This alternative would eliminate the potentially significant impact, as no impact would occur and no mitigation measures would be required.

Transportation

The No Project Alternative would not result in any changes to existing conditions at the Project Site, as no construction or new operational activities would occur under this alternative. Therefore, no changes to emergency access or conflicts with applicable program, plan, ordinance or policy addressing the circulation system would occur. However, it is noted that under this alternative, the consolidation of students from Morningside High School would still occur as it would under the Project, although the campus infrastructure and facilities would not be upgraded. Therefore, VMT impacts would be less than

significant and similar to the Project, as trips from combining both student populations onto one campus would be accounted for in both the No Project and Project scenarios.

Tribal Cultural Resources

As the No Project Alternative would not include construction activities, no ground disturbing activities would occur under this alternative and impacts related to the potential to encounter subsurface unanticipated prehistoric archaeological resources would be reduced as compared to the Project. This alternative would eliminate the Project's potentially significant impacts, as no impact would occur and no mitigation measures would be required. The No Project Alternative would have reduced impacts as compared to the Project as it relates to tribal cultural resources.

Relationship to Project Objectives

As described above, under Alternative 1 the Project Site would continue to operate as a school campus under the existing conditions including students continuing to be located within buildings impacted by airplane noise. However, Alternative 1 does not propose reconstruction of the campus and therefore, would not meet any of the seven Project objectives listed in Section 6.2, above.

6.4.2 Alternative 2 - Full Preservation of Historic Buildings

Alternative 2 proposes full preservation of the four potentially eligible historic structures (Building A, Building I, Building L, and Building M) rather than demolishing them and replacing them with new buildings. Buildings A, Building I, and Building M were determined to be individually eligible as a historical resource under the National Register at the local level and the California Register under criteria A/1 and C/3. Additionally, Buildings M and L were determined to be contributors to a historic district, eligible under the National Register at the local level and the California Register. As such, these four buildings are considered historical resources according to CEQA. The buildings that are not eligible historic structures would be demolished under this alternative, and new buildings would be constructed in their place to modernize the existing campus. The purpose of this alternative is to preserve the campus buildings that are considered eligible historic structures, thus eliminating the significant unavoidable impact to historic resources, while also attempting to meet at least a portion of the Project objectives.

Due to Building A's current proximity to an active fault line, several retrofits would be required to bring the building up to both Building Code and Educational Code standards. Under the Project, the new replacement Building A is sited more than 50 feet from the active fault (as required by State law), thereby eliminating the seismic hazard associated with surface fault rupture. The upgrades required to make Building A fully accessible would include an elevator, which may affect the building's structural integrity, as well as multiple lifts and ramps that may be difficult to add within the dimensions of the existing hallways and corridors. In addition, due to the acoustic improvements required for Building I to meet existing Educational Code standards, structural improvements would also be necessary. Due to the significant costs associated with renovating all eligible historic structures, Buildings M and L would be retained in place until funding becomes available for modernization.

Aesthetics - Lighting

Under this alternative, the combination field would remain in its current location; however, the tennis courts and basketball courts would need to be reconfigured to accommodate the retention of Buildings A, I, M, and L. Therefore, it is expected that this Alternative would result in a similar level of lighting spillover onto the western property line as the Project, thus resulting in a potentially significant impact requiring implementation of MM-AES-1. Impacts to light and glare would be similar to those of the Project.

Air Quality

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project which would lead to a significant impact without mitigation. However, it is noted that with retention of Buildings A, I, L, and M, there would be less demolition as compared to the Project and therefore, incrementally reduced air quality impacts during the construction phase.

Cultural Resources

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project which would result in significant impacts without mitigation. However, as this alternative would retain Buildings A, I, L, and M, it would reduce potential impacts to eligible historic buildings. It is noted that despite the reduction in impacts to an eligible historic building from retention, assessments of the building's structural integrity have determined that to bring the building up to code, potential rehabilitation of the building may still result in impacts to the building's historic eligibility.

Based on District coordination with DSA, despite the fact that Building A was retrofitted in 1934-35 after the Long Beach Earthquake, no building code was in place for retrofitting a school building under DSA jurisdiction. Therefore, renovation of Building A would require a full seismic retrofit, especially due to its proximity to an active fault. Seismic retrofits of Building A would include retrofit of all existing shear walls and adding new shear walls at existing narrow wall conditions, retrofitting all existing diaphragms and diaphragm connections to the shear walls, and addressing physical condition issues which may include replacement of flooring and ceilings.

DSA also confirmed that renovation to any floor of the building, including replacement of windows for noise mitigation, will trigger the need for accessibility to that floor – i.e. addition of an elevator for access to the basement and second floors.

In addition to mandatory seismic retrofit measures, any proposed renovation work of the Administration Building would include: hazardous material abatement; adding a lift, ramps, and elevator; upgrades and expansion of all toilet rooms for accessibility; noise mitigation including acoustical windows and insulation; waterproofing of basement walls; HVAC replacement; fire alarm system replacement; repair of fire sprinkler system affected by the seismic mitigation; and flooring/ceilings/lighting replacement.

However, despite these necessary upgrades, work performed on Building A would follow the Secretary of the Interior's Standards for Rehabilitation (Standards), which allow for the most flexibility and are

suitable for a classroom building on a school campus considering current safety and modernization needs. As part of this Alternative, work to Building A conducted in accordance with the Standards would ensure the retention and rehabilitation of the building's Public Works Administration Moderne style character-defining features (CDFs), which include formal symmetry and massing; brick masonry construction with reinforced steel trusses, beams and columns; flat roof with a raised parapet; plaster reeded pilasters on wide concrete piers; recessed window channels with horizontal line spandrels; cast concrete and plaster zigzag and diamond motifs, tiered vertical line accents, dentil moldings, and a geometric block cornice; stylized clock at the roofline; and incised ghost lettering above the entrance door that reads "Fine Arts Building." Building A's CDFs would be preserved, repaired if damaged, and/or replaced in kind if removed as part of the structural stabilization and roof replacement under this Alternative. This work approach would not only involve the repair of deferred maintenance at the building, but upon project completion, the building's CDFs would be restored and rehabilitated, which would further strengthen the building's historic integrity, and thus, its historic eligibility. As a result, upon Alternative completion, Building A would remain eligible as an individual resource.

Building I would require similar retrofits and rehabilitation efforts to those noted in Alternative 3, which would address deferred maintenance at the building and further strengthen the identified character-defining features (CDFs), resulting in the building's reinforced historic integrity. Thus, Building I would remain eligible as a historical resource.

With the retention of Buildings M and L, the Alternative would involve mothballing the two buildings. Mothballing is a process of securely enclosing the building envelope and shutting off electrical and water connections in order to ensure that buildings will not undergo further deterioration or vandalism while awaiting rehabilitation and seismic retrofit construction efforts. Studies indicate that, in the future, Building M will require replacement of the roof, installation of thermal and moisture protection for the building, replacement of all exterior windows, replacing the elevator and restrooms, additional building upgrades to bring the noise levels to an acceptable standard, HVAC and ductwork upgrades, as well as seismic retrofits to bring the building up to code compliance for student occupation. Building L will require similar upgrades including roof replacement, replacement of all exterior windows, replacement of restroom, HVAC improvements, any necessary seismic upgrades, and additional upgrades to bring noise levels to an acceptable standard. Thus, Building M and Building L would remain eligible as historical resources.

With these building upgrades, rehabilitation efforts, and mothballing, the historic integrity of Building A, Building I, Building L and Building M, including the IHS Industrial Shop District, would be maintained and strengthened, allowing them to remain eligible as historic resources upon the completion of this Alternative.

Therefore, the Alternative would result in reduced impacts as compared to the Project.

Energy

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project and impacts would therefore be less than significant. It is noted that with retention of Buildings A, I, M, and L there

would be incrementally less demolition as compared to the Project and the potential to reduce energy usage impacts incrementally during the construction phase.

Geology and Soils - Paleontological Resources

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project, which is anticipated to result in a potentially significant impact to paleontological resources. However, as this alternative would retain Buildings A, I, M, and L and reduce the ground disturbance footprint, the potential to encounter subsurface unanticipated paleontological resources would be incrementally reduced compared to the Project. Impacts would be less than significant with mitigation.

Greenhouse Gas Emissions

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project, which is expected to result in a less than significant impacts relative to greenhouse gas emissions. It is noted that with retention of Buildings A, I, M, and L, there would be incrementally less demolition compared to the Project, and thus this alternative is anticipated to reduce GHG emission impacts during the construction phase, though impacts would remain less than significant.

Noise

Despite the proposed reconfiguration of the Project Site under this alternative and retention of Buildings A, I, M, and L, impacts would be similar to the Project as the campus would undergo a similar scale of reconstruction intensity and duration. Therefore, this alternative would result in significant impacts without the implementation of mitigation. As this alternative would result insignificant construction noise impacts, would be required and implementation of the mitigation measures outlined in Section 4.7impacts would be reduced to less than significant similar to the Project.

Transportation

Despite the proposed reconfiguration of the Project Site under this alternative and retention of Buildings A, I, M, and L, impacts would be less than significant and similar to those of the Project relative to transportation impacts as this alternative would also be subject to design review for adequate emergency access and site circulation. In addition, the proposed reconfiguration of the Project Site under this alternative would not lead to conflicts with applicable program, plan, ordinance or policy addressing the circulation system as compared to the Project, and thus impacts in this regard would also remain less than significant. It is noted that under this alternative, the consolidation of students from Morningside High School would still occur as it would under the Project and therefore, impacts would be similar to the Project as trips from combining both student populations onto one campus.

Tribal Cultural Resources

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project, which would result in significant impacts to tribal cultural resources requiring implementation of applicable mitigation measures. However, as this alternative would retain Buildings A, I, M, and L, and reduce the ground

disturbance footprint, the potential to encounter subsurface unanticipated prehistoric archaeological resources would be incrementally reduced as compared to the Project, though impacts would still require mitigation measures to be reduced to less than significant.

Relationship to Project Objectives

Under Alternative 2, new classroom and school facilities would be provided with the exception of Buildings A, I, M, and L which would be renovated or retained in place instead of demolished and rebuilt. This alternative would meet some of the Project objectives, but those would be met to a lesser extent than the Project. The objectives that would be met to a lesser extent would be meeting the needs of District students, renovating existing buildings, and providing and connecting gathering spaces on campus (Objectives 1, 4, and 5). With renovation of Building A, due to the extent of required seismic mitigation measures, and the building's location within an earthquake fault zone, DSA approval for rehabilitation of Building A may be challenging. In addition, the installation of an elevator and interior wheelchair lifts for access to all corridor and classroom levels would reduce usable space within the building. With the renovation of Building I, the classroom building would have smaller classroom sizes and would not provide the school with a modernized facility to fully meet student and staff needs. Therefore, Alternative 2 would not meet Objectives 2 and 3, providing a modernized campus and constructing new buildings that bring the campus up to code.

Due to budget constraints, under Alternative 2, Buildings M and L would be retained in place for renovation at a later time.

6.4.3 Alternative 3 - Partial Preservation (Building I)

Under the Partial Preservation Alternative, Building I would remain in its current location and would be modernized as a classroom structure. Buildings A, L, and M, as well as the other buildings proposed for demolition under the Project, would be demolished and new buildings would be built to provide classroom and administrative space. The sports courts would be reconfigured to accommodate the retention of Building I; however, the number of courts would not change. Other than the modernization of this specific eligible historic structure, the remainder of campus would be developed with the buildings, landscaping, pathways, and lighting described under the Project.

Under Alternative 3, the existing spaces of Building I would continue to be used as classrooms with minor renovations to interior finishes and the rehabilitation of the building's exterior. However, the classrooms are under the California Department of Education's (CDE's) minimum square footage requirement of 960 SF. The classrooms are best suited for general instruction and would not be appropriate for Career and Technical Education (CTE) or music classrooms that require large areas or specialized equipment. In addition, the existing restrooms would require renovations, including relocation or removal of numerous fixtures to meet accessibility codes. Toilet fixture partitions also need to be removed and replaced.

Airplane noise is significant on campus due to Inglewood High School's position within the 65 dB noise contour of Los Angeles International Airport. An environmental noise study was completed, and combined with further acoustic analysis, the District identified minimum requirements for various

building specifications that need to be incorporated into any building rehabilitation on campus, which are as follows:

- Exterior Wall Assemblies: minimum STC 42
- Roof Assemblies: minimum STC 46
- Ceilings: minimum 0.7 NRC, 40 CAC. 6" Batt Insulation in Ceiling Cavity.
- Windows: minimum STC 43
- Mechanical Systems: Down-discharge units with spring vibration isolation curb. Duct liner.
- Exterior Doors: minimum STC 40

To protect the classroom spaces from aircraft noise, the following additional improvements are also recommended:

- Adding layers of continuous and batt insulation to the existing walls and roof/ceiling assemblies is likely required to increase the STC ratings of the envelope.
- All exterior windows are recommended to be replaced with high STC products.
- Interior ceiling tiles should be replaced.
- Exterior doors should be replaced.
- Replace single-zone package HVAC units, heaters, exhaust fans and associated accessories.
- Replace all original ductwork.

The District has determined that the renovations required to update the classrooms, provide adequate acoustic assemblies, and upgrade the toilet rooms exceed 50% of the replacement value of the building, as outlined by DSA, which triggers a requirement for a full seismic upgrade of Building I's structure.

A seismic mitigation study of Building I was completed to determine what improvements to Building I would be necessary to allow it to meet current Building Code seismic safety requirements. This study found that the anchorage between the exterior concrete walls and roof framing is insufficient for the out-of-plan loading. A new steel perimeter ledger would be required to address this. Additional measures were determined to be necessary for a full seismic upgrade including significant foundation reinforcement via micropiles or similar method. The existing concrete walls would also need to be strengthened utilizing fiber-reinforced polymer (FRP) measures if the existing walls are within design limits. If not, new concrete shear walls may be necessary. Diaphragm strengthening would also likely be required.

Aesthetics - Lighting

Under this alternative, the combination field would remain in its current location, and only the tennis courts would need to be reconfigured to accommodate the retention of Building I. As the combination field would remain in its current location, Alternative 3 would result in significant impacts related to lighting due to spillover. Therefore, as this Alternative would be similar in impacts the Project related to lighting spillover onto the western property line, it would not eliminate significant impacts related to lighting and would be subject to implementation of MM-AES-1.

Air Quality

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project and would therefore result in a significant impact without mitigation. It is noted that with retention of Building I, there would be incrementally less demolition as compared to the Project and therefore, potentially incrementally less air quality impacts during the construction phase. However, the Alternative would be subject to mitigation to reduce impacts to less than significant, similar to the Project.

Cultural Resources

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar level of reconstruction intensity and duration as the Project. This alternative would retain Building I and would reduce potential impacts to an eligible historic building. It is noted that despite the reduction in impacts to an eligible historic building from retention, assessments of the building's structural integrity have determined that to bring the building up to code.

However, despite these necessary upgrades, work performed on Building I would follow the Secretary of the Interior's Standards for Rehabilitation (Standards), which allow for the most flexibility and are suitable for a classroom building on a school campus considering current safety and modernization needs. As part of this Alternative, work to Building I conducted in accordance with the Standards would ensure the retention and rehabilitation of the building's PWA Moderne style character-defining features (CDFs), which include its formal symmetry and massing; curved walls and low entrance piers; flat roof with raised parapet; plaster reeded pilasters; recessed window channels with horizontal line spandrels; and cast concrete and plaster ornamentation including curved planters with medallion designs and vertical speedline accents. Building I's CDFs would be preserved, repaired if damaged, and/or replaced in kind if removed as part of the structural stabilization and roof replacement. This work approach would not only involve the repair of any deferred maintenance at the building, but upon project completion, the building's CDFs would be restored and rehabilitated which would further strengthen the building's historic integrity, and thus, its historic eligibility. As a result, upon Alternative completion, Building I would remain eligible as an individual resource.

However, with the implementation of the Alternative, Project impacts to historical resources would remain significant and unavoidable due to the demolition of Building A, Building L, and Building M despite the retention and rehabilitation of Building I. Yet with the proposed retention and rehabilitation of Building I, impacts to historical resources as part of the Alternative would be significantly reduced in comparison to the Project, given that an individually eligible historical resource, reflective of one of two significant identified historic patterns of development, architectural styles, and associated master architects at the campus would remain. Therefore, the Alternative would result in reduced impacts as compared to the Project.

Energy

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project and would therefore result in less than significant impacts. It is noted that with retention of Building I, there would

be incrementally less demolition as compared to the Project and the potential to reduce energy usage impacts incrementally during the construction phase.

Geology and Soils - Paleontological Resources

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project and would therefore result in significant impacts without implementation of mitigation. As this alternative would retain Building I and reduce the ground disturbance footprint, the potential to encounter subsurface unanticipated paleontological resources would be incrementally reduced as compared to the Project but would be subject to mitigation to reduce it to less than significant, similar to the Project.

Greenhouse Gas Emissions

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project and would therefore result in less than significant impacts. However, it is noted that with retention of Building I, there would be incrementally less demolition as compared to the Project and the potential to reduce GHG emission impacts incrementally during the construction phase.

Noise

Despite the proposed reconfiguration of the Project Site under this alternative and retention of Building I, impacts would be similar to the Project as the campus would continue to undergo a similar scale of reconstruction intensity and duration. This alternative would have similar potentially significant construction noise impacts, requiring implementation of the mitigation measures outlined in Section 4.7. With implementation of mitigation measures, impacts would be less than significant.

Transportation

Despite the proposed reconfiguration of the Project Site under this alternative and retention of Building I, impacts would be similar to the Project as this alternative would also be subject to design review for adequate emergency access. In addition, the proposed reconfiguration of the Project Site under this alternative would not lead to conflicts with applicable program, plan, ordinance or policy addressing the circulation system as compared to the Project. Alternative 3 would therefore result in less than significant impacts related to transportation. It is noted that under this alternative, the consolidation of students from Morningside High School would still occur as it would under the Project and therefore, impacts would be similar to the Project as trips from combining both student populations onto one campus.

Tribal Cultural Resources

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project and impacts would be significant without mitigation. However, as this alternative would retain Building I and therefore reduce the ground disturbance footprint, the potential to encounter subsurface unanticipated prehistoric archaeological resources would be incrementally reduced as compared to the Project.

Relationship to Project Objectives

Under Alternative 3, new classroom facilities would be provided, with the exception of Building I, which will be retained and rehabilitated for continued use instead of being demolished and rebuilt. This alternative would meet the majority of the Project objectives, but to a lesser extent than the Project. The objectives that would be met to a lesser extent would be meeting the needs of District students, reconstructing to provide a modernized campus, and constructing new buildings to bring the campus up to code (Objectives 1, 2, and 3). With the renovation of Building I, the classroom building would have smaller classroom sizes and would not provide the school with a modernized facility to meet student and staff needs. As noted above, the existing spaces in Building I would continue to be used as classrooms, brought up to code through structural modifications, and include minor renovations to interior finishes. However, the classrooms are under CDE's minimum square footage requirement of 960 SF. The classrooms are best suited for general instruction and would not be appropriate for CTE or music classrooms that require large areas or specialized equipment.

6.4.4 Alternative 4 – Expanded Partial Preservation (Buildings I, L, and M)

Under the Expanded Partial Preservation Alternative, Building I, would remain in its current location and would be modernized as a classroom structure. Buildings M and L would be retained in place until funding is available for modernization. Building A, as well as the other buildings noted for demolition as proposed under the Project, would be demolished, and new buildings would be built to provide classroom and administrative space. The sports courts would be reconfigured to accommodate the retention of Buildings I, L, and M; however, the number of courts would not change. Other than the retention of these specific eligible historical structures, the remainder of the campus would be developed with the buildings, landscaping, pathways, and lighting described under the Project.

Under Alternative 4, similar to Alternative 3, the existing spaces of Building I would continue to be used as classrooms with minor upgrades to interior finishes. However, Buildings L and M would simply be retained in place to protect their eligibility as historical resources; when future renovation and retrofits become more feasible in the future to allow for proposed modernizations to occur. As such, the historic integrity of Buildings L and M would be maintained, allowing the historical resources to remain eligible for listing. Therefore, the Alternative would result in reduced impacts as compared to the Project.

Aesthetics - Lighting

Under this alternative, the combination field would remain in its current location, and only the tennis courts would need to be reconfigured to accommodate the retention of Buildings I, M, and L. Therefore, it is expected that this Alternative would result in a similar level of lighting spillover onto the western property line as the Project, thus resulting in a potentially significant impact requiring implementation of MM-AES-1. Impacts to light and glare would be similar to those of the Project.

Air Quality

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project which would lead to a significant impact without mitigation. However, it is noted that with retention of Buildings I, L,

and M, there would be less demolition as compared to the Project and therefore, incrementally reduced air quality impacts during the construction phase.

Cultural Resources

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project which would result in significant impacts without mitigation. However, as this alternative would retain Building I, L, and M, it would reduce potential impacts to eligible historic buildings. It is noted that, despite the reduction in impacts to an eligible historic building from retention, assessments of the building's structural integrity have determined that bringing the building up to code may still result in impacts to its historic eligibility.

Building I would require similar retrofits and rehabilitation efforts as those noted in Alternative 3, which would address deferred maintenance at the building and involve a further strengthening of the identified character-defining features (CDFs), resulting in the building's reinforced historic integrity. Thus, Building I would remain eligible as an individual resource under National Register Criteria A/C at the local level and California Register Criteria 1/3.

With the retention of Buildings M and L, the Alternative would involve mothballing the two buildings. Mothballing is process of securely enclosing the building envelope and shutting off electrical and water connections in order to ensure that buildings would not undergo further deterioration or vandalism while awaiting rehabilitation and seismic retrofit construction efforts. Studies indicate that Building M will require replacement of the roof, installation of thermal and moisture protection for the building, replacement of all exterior windows, replacing the elevator and restrooms, additional building upgrades to bring the noise levels to an acceptable standard, HVAC and ductwork upgrades, as well as seismic retrofits to bring the building up to code compliance for student occupation. Work to rehabilitate Building L would likely include a similar, although smaller, scope of work. Thus, Building M and Building L would remain eligible as historical resources.

With these building upgrades, rehabilitation efforts, and mothballing, the historic integrity of Building I, Building L and Building M, including the IHS Industrial Shop District, would be maintained and strengthened, allowing them to remain eligible as historic resources upon the completion of this Alternative.

Therefore, the Alternative would result in reduced impacts as compared to the Project.

Energy

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project and impacts would therefore be less than significant. It is noted that with retention of Buildings I, M, and L there would be incrementally less demolition as compared to the Project and the potential to reduce energy usage impacts incrementally during the construction phase.

Geology and Soils - Paleontological Resources

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project, which is anticipated to result in a potentially significant impact to paleontological resources. However, as this alternative would retain Buildings I, L, and M and reduce the ground disturbance footprint, the potential to encounter subsurface unanticipated paleontological resources would be incrementally reduced compared to the Project. Impacts would be less than significant with mitigation.

Greenhouse Gas Emissions

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project, which is expected to result in a less than significant impacts relative to greenhouse gas emissions. It is noted that with retention of Buildings I, M, and L, there would be incrementally less demolition compared to the Project, and thus this alternative is anticipated to reduce GHG emission impacts during the construction phase, though impacts would remain less than significant.

Noise

Despite the proposed reconfiguration of the Project Site under this alternative and retention of Buildings I, M, and L, impacts would be similar to the Project as the campus would undergo a similar scale of reconstruction intensity and duration. Therefore, this alternative would result in significant impacts without the implementation of mitigation. As this alternative would result insignificant construction noise impacts, would be required and implementation of the mitigation measures outlined in Section 4.7impacts would be reduced to less than significant similar to the Project.

Transportation

Despite the proposed reconfiguration of the Project Site under this alternative and retention of Buildings I, M, and L, impacts would be less than significant and similar to those of the Project relative to transportation impacts as this alternative would also be subject to design review for adequate emergency access and site circulation. In addition, the proposed reconfiguration of the Project Site under this alternative would not lead to conflicts with applicable program, plan, ordinance or policy addressing the circulation system as compared to the Project, and thus impacts in this regard would also remain less than significant. It is noted that under this alternative, the consolidation of students from Morningside High School would still occur as it would under the Project and therefore, impacts would be similar to the Project as trips from combining both student populations onto one campus.

Tribal Cultural Resources

Despite the proposed reconfiguration of the Project Site under this alternative, the Alternative would continue to undergo a similar scale of reconstruction intensity and duration as the Project, which would result in significant impacts to tribal cultural resources requiring implementation of applicable mitigation measures. However, as this alternative would retain Buildings I, M, and L, and reduce the ground disturbance footprint, the potential to encounter subsurface unanticipated prehistoric archaeological resources would be incrementally reduced as compared to the Project, though impacts would still require mitigation measures to be reduced to less than significant.

Relationship to Project Objectives

Under Alternative 4, new classroom facilities would be provided with the exception of Buildings I, M, and L which would be renovated or retained instead of demolished and rebuilt. This alternative would meet the majority of the Project objectives, but to a lesser extent than the Project. The objectives that would be met to a lesser extent would be meeting the needs of District students, reconstructing to provide a modernized campus, and constructing new buildings to bring the campus up to code (Objectives 1, 2, and 3). With the renovation of Building I, the classroom building would have smaller classroom sizes and would not provide the school with a modernized facility to fully meet student and staff needs.

Due to budget constraints, under Alternative 4, Buildings M and L would be retained in place for renovation at a later time.

6.5 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. Selection of an environmentally superior alternative is based on comparison of the alternatives to determine which among the alternatives would reduce or eliminate the impacts associated with the Project to the greatest degree. The comparative impacts of the Project and the Project alternatives are summarized in **Table 6-1**, *Comparison of the Impacts of the Project and Alternatives*, below. In addition, **Table 6-2**, *Ability of Alternatives to Meet Project Objectives*, provides a comparison of the ability of the analyzed alternatives to meet Project Objectives relative to the Project's ability to meet those objectives.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project Alternative, would be considered the environmentally superior because it would not involve demolition of buildings and construction of new buildings throughout the Project Site, and assumes the current classrooms would continue to operate similar to existing conditions. Alternative 1 would not meet any of the Project Objectives and would avoid all of the Project's potentially significant impacts and would have less impacts compared to the Project. However, because Alternative 1 has been identified as the environmentally superior alternative, identification of another environmentally superior alternative among the Project's remaining "build" alternatives is required.

Alternative 2, the Full Preservation of Historic Buildings Alternative would involve demolition of fewer buildings compared to the Project, while still achieving some of the Project objectives. Alternatives 2 would eliminate the Project's significant unavoidable impact to cultural resources by retaining and renovating the existing eligible historic buildings. As shown in Table 6-1, Alternative 2 would result in three "similar" impacts for the issue areas analyzed compared to the Project and six "less" impacts compared to the Project. Alternative 2 is considered the environmentally superior alternative among the Project's "build" alternatives, as it is the only alternative besides the No Project Alternative that would eliminate the significant unavoidable impacts to cultural resources due to the retention of all of the eligible historic structures. In addition, the reduced demolition footprint of Alternative 2 would result in an incrementally reduced scale of impacts related to air quality, greenhouse gas emissions, archaeological resources, paleontological resources, and tribal cultural resources as compared to Alternatives 3 and 4. Alternative 2

would also fully meet three of the Project objectives and would partially meet two of the Project objectives, and would not achieve two of the stated Project objectives (reconstruct the school to provide a modernized campus and construct new buildings that bring the campus up to code). While all of the objectives outlined in Section 6.2 are important in meeting the District's goals, these two goals of providing a modernized campus and constructing new buildings that bring the campus up to code are especially important to the success of the Project and the long-term operation of the school. Due to the campuses aged condition, the current buildings on campus, including the eligible historic buildings, do not provide the facilities that are code-compliant or meet the needs of current students. The Inglewood High School campus faces unique challenges due to the proximity to the Los Angeles International (LAX) flight path. None of the existing buildings adequately protect the students from airplane noise in their current condition. Thus, meeting the goals of providing a modernized campus and constructing new buildings that bring the campus up to code is also important in providing acoustic comfort at the campus. District students, teachers, and staff have been awaiting a high school that provides classrooms and facilities that are more modernized and appropriate for a variety of classroom types including laboratory classrooms and music classrooms. Overall, a holistic design for new buildings and a reorganized campus are required in order to address the full range of District objectives.

TABLE 6-1
COMPARISON OF PROJECT ALTERNATIVE IMPACTS

Environmental Resource	Impacts Analysis				
	Project	Alternative 1 No Project	Alternative 2 Full Preservation	Alternative 3 Partial Preservation	Alternative 4 Expanded Partial Preservation
Aesthetics - Lighting	LTS w/ MM	<	=	=	=
Air Quality	LTS w/ MM	<	<	<	<
Cultural Resources	SU	<	<	<	<
Energy	LTS	<	<	<	<
Geology and Soils – Paleontological Resources	LTS w/ MM	<	<	<	<
Greenhouse Gas Emissions	LTS	<	<	<	<
Noise	LTS	<	=	=	=
Transportation	LTS	<	=	=	=
Tribal Cultural Resources	LTS w/ MM	<	<	<	<

IMPACT CONCLUSIONS:
LTS Less-than-Significant without Mitigation
LTS/M Less-than-Significant with Mitigation
SU Significant and Unavoidable
SYMBOLS:
< Reduced impact in comparison to the proposed Project
= Similar impact in comparison to the proposed Project.
> Greater impact in comparison to the proposed Project

TABLE 6-2
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES

	Project	Alternative 1: No Project Alternative	Alternative 2: Full Preservation Alternative	Alternative 3: Partial Preservation Alternative	Alternative 4: Expanded Partial Preservation Alternative
1. Meet the needs of District students through the development of classrooms that are clean, safe, and well-equipped to allow for effective teaching and learning.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Partially Meets Objective	Partially Meets Objective
2. Reconstruct the existing Inglewood High School campus to provide a modernized campus, as well as a comfortable and safe environment, that benefits both students and staff.	Fully Meets Objective	Does Not Meet Objective	Does Not Meet Objective	Partially Meets Objective	Does Not Meet Objective
3. Construct new buildings that would bring the campus up to code (Educational Code, Building Code, etc.) to provide safety and security, including meeting ADA accessibility requirements.	Fully Meets Objective	Does Not Meet Objective	Does Not Meet Objective	Partially Meets Objective	Does Not Meet Objective
4. Renovate existing buildings to provide a cohesive look throughout the campus	Fully Meets Objective	Does not Meet Objective	Partially Meets Objective	Fully Meets Objective	Partially Meets Objective
5. Provide and connect gathering spaces on campus, including provision of shade.	Fully Meets Objective	Does not Meet Objective	Partially Meets Objective	Fully Meets Objective	Partially Meets Objective
6. Provide upgraded sports facilities to accommodate sports practices, school events, and recreational facilities for public use.	Fully Meets Objective	Does not Meet Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective
7. Integrate the campus into the adjacent urban fabric, to serve as a resource for the community.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective (to a lesser extent than the Project)	Fully Meets Objective	Fully Meets Objective

Source: ESA, 2025

CHAPTER 7
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CHAPTER 8
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