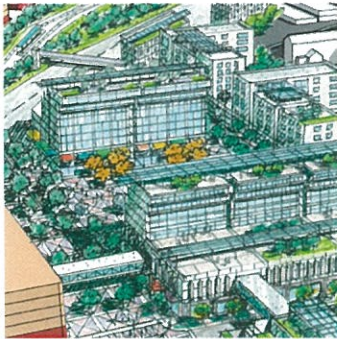


Draft Environmental Impact Report

Transit Oriented Development Plans for the Westchester/Veterans and Crenshaw/Imperial Metro Station Areas

City of Inglewood EA-EIR-2021-066



PREPARED FOR:

City of Inglewood
One Manchester Boulevard, Fourth Floor
Inglewood, CA 90301

Prepared by:

Metis Environmental Group
437 Alcatraz Avenue
Oakland, CA 94609

May 2021

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EXECUTIVE SUMMARY

ES-1 INTRODUCTION

In accordance with Section 15123 of the California Environmental Quality Act (CEQA) Guidelines, this chapter provides a summary of the proposed Westchester/Veterans Station Area and Crenshaw/Imperial Transit-Oriented Development (TOD) Plans, their environmental effects, and the mitigation measures to be implemented to address the significant effects that would result from the proposed TOD Plans. This chapter also summarizes the technical analyses completed for CEQA. The summary includes a brief description of proposed development, project objectives, City of Inglewood (City), and other agency approvals needed to implement the project, areas of controversy/issues to be resolved, and a summary of alternatives to the proposed Specific Plan. In addition, this chapter summarizes (1) potential environmental impacts that would result from the proposed Specific Plan; (2) the level of significance of the environmental impacts prior to implementation of any applicable mitigation measures; (3) mitigation measures that would be implemented to avoid or reduce significant environmental impacts; and (4) the level of significance of impacts after mitigation measures are implemented.

The purpose of the analyses contained in this EIR is to provide information to decision makers and the public, and to define and quantify the physical environmental changes that would result from implementation of the proposed TOD Plans.

ES-2 PROJECT LOCATION

Figure 1-1 indicates the location of the Westchester/Veterans and Crenshaw/Imperial planning areas. The Westchester/Veterans planning area consists of approximately 432 acres generally encompassing the area within the City of Inglewood that is half-mile from the Westchester/Veterans Metro Station, which is currently under construction at the Florence Avenue/Hindry Avenue intersection. The Crenshaw/Imperial planning area consists of approximately 221 acres located north of the Crenshaw Boulevard interchange along the I-105 freeway, and generally encompasses the area within the City of Inglewood that is half-mile from the Crenshaw Metro Green Line Station.

ES-3 PROJECT DESCRIPTION

Existing General Plan land use designations for the Westchester/Veterans planning area will be replaced with a single “Westchester/Veterans Transit Oriented District” designation, and existing General Plan land use designations for the Crenshaw/Imperial planning area will be

replaced with a single “Crenshaw/Imperial Transit Oriented District” designation. The TOD Plans for the two planning areas provide detailed land use plans and policy direction for appropriate uses and development intensity for each planning area. The TOD Plans provide for enhanced pedestrian and bicycle mobility within the two planning areas, along with improved access to the two Metro stations that are at the center of the planning areas. The TOD Plans also provide for the creation of new and enhancement of existing public spaces within the Westchester/Veterans and Crenshaw/Imperial areas.

The proposed TOD Plans also involve modifications to existing zoning designations to provide form-based development regulations integrated with design guidelines aimed at maximizing use of transit, bicycling, and walking within the Westchester/Veterans and Crenshaw/Imperial areas. These regulations set forth opportunities for increased development intensity in mixed use settings, along with expansion of employment-generating uses, particularly in the Westchester/Veterans area. Recognizing the intended transit orientation of new development within the Westchester/Veterans and Crenshaw/Imperial areas, proposed zoning regulations include reductions in minimum parking requirements for uses and locations most amenable to transit use. Overall, the TOD plans would provide for increased residential and commercial/office use, along with modernization of existing retail development. The specific types of development proposed for the Westchester/Veterans and Crenshaw/Imperial areas are described in **Table ES-1, Proposed Development** and **Table ES-2, Proposed Development Summary**.

TABLE ES-1: PROPOSED DEVELOPMENT

	RESIDENTIAL (units)	RETAIL (s.f.)	COMMERCIAL/ OFFICE (s.f.)	HOTEL (s.f.)	INSTITUTIONAL (s.f.)	INDUSTRIAL (s.f.)
Westchester/Veterans						
Existing Development	1,596	356,215	419,242	80,645	245,161	2,833,385
Future Demolition	37	50,219	61,065	22,694	103,615	253,639
Future Construction	1,143	234,707	1,422,232	34,689	0	0
Development at Buildout	2,702	540,703	1,780,409	92,640	141,546	2,579,746
Crenshaw/Imperial						
Existing Development	1,044	527,735	190,218	49,497	152,809	0
Future Demolition	83	501,773	129,053	17,390	15,216	0
Future Construction	3,067	376,744	45,067	0	0	0
Development at Buildout	4,028	402,706	106,232	32,107	137,593	0
Project Total						
Existing Development	2,640	883,950	609,460	130,142	397,970	2,833,385
Future Demolition	120	551,992	193,118	40,084	118,831	253,639
Future Construction	4,210	611,451	1,467,299	34,689	0	0
Development at Buildout	6,730	943,409	1,883,641	124,707	279,139	2,579,746

Source: The Arroyo Group, 2021.

TABLE ES-2: PROPOSED DEVELOPMENT SUMMARY

	RESIDENTIAL (units)	POPULATION	NON-RESIDENTIAL (s.f.)	JOBS
Westchester/Veterans				
Existing Development	1,596	4,617	5,008,003	7,217
Future Demolition/Loss	37	102	465,087	772
Future Construction	1,143	3,155	1,412,676	6,297
Development at Buildout	2,702	7,670	5,955,592	12,742
Net Change	1,106	3,053	947,589	5,525
Crenshaw/Imperial				
Existing Development	1,044	3,281	920,259	3,578
Future Demolition/Loss	83	229	663,432	858
Future Construction	3,067	8,465	421,810	1,017
Development at Buildout	4,028	11,517	678,638	3,737
Net Change	2,984	8,236	-241,621	159
Project Total				
Existing Development	2,640	7,898	5,928,262	10,795
Future Demolition/Loss	120	331	1,128,519	1,630
Future Construction	4,210	11,620	1,834,486	7,314
Development at Buildout	6,730	19,187	6,634,229	16,479
Net Change	4,090	11,289	705,968	5,684

Source: The Arroyo Group, 2021.

ES-3.1 PROJECT OBJECTIVES

a. Overarching Objective of the TOD Plans

The overarching objectives and underlying purpose of the proposed TOD Plans for the Westchester/Veterans and Crenshaw/Imperial areas are to:

- Expand economic development opportunities and enhance revenue-generating activities that support the City’s economy and the delivery of public services, and increase opportunities for employment and housing;
- Maximize utilization of the Metro Crenshaw/LAX Line Westchester/Veterans Station and the Metro Green Line Crenshaw Station through the creation of pedestrian-friendly and economically vibrant mixed-use settings and improved non-vehicular access to the stations; and
- Protect and enhance existing residential neighborhoods.

b. Additional Objectives of the TOD Plans

Additional objectives of the TOD Plans include:

- Providing a model for sustainable development and implementing the Inglewood Energy and Climate Action Plan;
- Developing multi-modal gateways to the City of Inglewood;
- Encouraging art and technology by providing appropriate settings for their development;
- Providing unique open space resources serving both nearby employees and residents of the City;
- Enhancing the Crenshaw/Imperial area as a complete neighborhood hub providing housing, shopping, education, and recreation for residents of all ages and households of all types; and
- Maintaining a safe, well-maintained, unified, and attractive community with a unique sense of place.

ES-4 ANTICIPATED DISCRETIONARY ACTIONS AND APPROVALS

Implementation of the proposed project will require the following discretionary actions and other approvals. The list below identifies the discretionary approvals that are anticipated and therefore analyzed at a programmatic level in this Draft Program EIR.

ES-4.1 CURRENT PROPOSED ACTIONS BY THE CITY OF INGLEWOOD

The following actions are currently being considered by the City of Inglewood:

- Approval of Transit Oriented Development Plans for the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas, each of which includes a Concept Plan, Transit Oriented Development zoning, and Design Guidelines.
- Approval of a General Plan Amendment for the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas.

ES-4.2 POTENTIAL FUTURE ACTIONS BY THE CITY OF INGLEWOOD

The following actions may be considered by the City of Inglewood to implement the proposed TOD Plans:

- Approval of future site-specific development projects within the Westchester/Veterans and Crenshaw/Imperial areas consistent with the provisions of the applicable Transit Oriented Development Plan.
- Close Isis Avenue north of Manchester Boulevard for open space.
- Eliminate westbound travel and parking lane on Olive Street between Manchester Boulevard and Glasgow Avenue for open space.
- Establish property-based Business Improvement Districts for the Westchester/Veterans and Crenshaw/Imperial areas.
- Capital improvement projects within the Westchester/Veterans area (see **Figure 2-18**).
- Capital improvement projects within the Crenshaw/Imperial area (see **Figure 2-19**).
- Establish Enhanced Infrastructure Financing Districts for the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas.
- Approval of an inclusionary zoning policy to require affordable housing within new residential developments.
- Construct City Gateway Park on the east side of Crenshaw Boulevard south of 118th Street in coordination with the City of Hawthorne.

ES-4.3 POTENTIAL FUTURE ACTIONS BY OTHERS

As the result of the proposed TOD Plans, the following actions may be considered in the future by agencies other than the City of Inglewood:

- Crenshaw Boulevard/I-105 Freeway On-Ramp Redesign (Caltrans, City of Hawthorne)
- New portal to the Westchester/Veterans Metro Station (Los Angeles Metro)

ES-5 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

ES-5.1 EFFECTS FOUND NOT TO BE SIGNIFICANT

The analyses undertaken during preparation of this EIR determined that the following impacts would be less than significant and not require detailed analysis.

a. Aesthetics and Visual Resources

Public Resources Code §21099(d)(1) states, “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Since both TOD plans exclusively propose residential, mixed-use residential, and employment-generating uses on infill sites that are within one-half mile of an existing major transit stop (Metro light rail), aesthetic impacts are not considered significant under CEQA.

b. Agricultural and Forestry Resources

The Westchester/Veterans and Crenshaw/Imperial TOD Plan areas are within a fully urban setting, have long been developed, and do not provide any opportunity for agricultural or forestry use. The Westchester/Veterans and Crenshaw/Imperial areas do not contain any lands planned, zoned, used, or suitable for commercial agriculture; do not contain any state-designated farmland; and do not contain or abut any forest resources. Therefore, the TOD Plans for the Westchester/Veterans and Crenshaw/Imperial areas would have no impact on agricultural or forestry resources.

c. Biological Resources

The Westchester/Veterans and Crenshaw/Imperial TOD Plan areas are located in an urban setting that has long been developed and does not support sensitive biological resources. The City of Inglewood General Plan Background Report (2006) acknowledges that sensitive biological resources would not occur, unless sensitive biological habitats are created in the future.

The Westchester/Veterans and Crenshaw/Imperial areas do not support sensitive biological resources and do not include lands identified in conservation or regional habitat conservation plans. There are no sensitive habitats such as wetlands, waters, marshes, or riparian areas present. The California Natural Diversity Database does not identify any recently recorded observations of sensitive plant or animal species or sensitive habitats protected under state or federal endangered species acts (CNDDDB, 2016). The last known occurrence of a sensitive species in Inglewood is dated 1906, long before the area was developed for urban uses, and the database indicates the species identified at that time is now considered “extirpated,” meaning it no longer occurs in Inglewood. No habitat creation is proposed as part of the Westchester/Veterans and Crenshaw/Imperial TOD Plans. Therefore, the Westchester/Veterans and Crenshaw/Imperial TOD Plans would not impact any sensitive biological resources.

d. Mineral Resources

According to the City of Inglewood General Plan Update (2006), oil is the only extractable resource known to exist within the City, with the possible associated presence of natural gas. The Westchester/Veterans and Crenshaw/Imperial TOD Plan areas have been fully developed with urban uses for several decades and contain no known existing mineral resources. The California Geological Survey has classified lands within Los Angeles County into Mineral Resource Zones (MRZs) based on guidelines adopted by the California State Mining and Geology Board, as mandated by the Surface Mining and Reclamation Act of 1974. The Westchester/Veterans and Crenshaw/Imperial TOD Plan areas have been mapped by the California Department of Mines and Geology primarily as MRZ-1, an area where adequate information indicates a low likelihood of significant mineral resources. Some areas are also zoned MRZ-3, indicating that the significance of mineral deposits cannot be determined from the available data. However, there are no lands designated MRZ-2, which encompass areas where adequate information indicates that significant mineral deposits are present, or there is a likelihood of their presence, and development should be controlled, within or near the Westchester/Veterans and Crenshaw/Imperial areas.

The intent of designating significant mineral deposits is to identify areas where mineral extraction could occur prior to other types of development. Therefore, the proposed TOD Plans for the Westchester/Veterans and Crenshaw/Imperial areas would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state and would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. The TOD Plans would therefore have no impact on mineral resources.

e. Transportation: Substantial Hazards due to Incompatible uses

Among the CEQA Guidelines Appendix G thresholds is the question as to whether a project would substantially increase hazards due to geometric design features or incompatible uses. While the Westchester/Veterans and Crenshaw/Imperial TOD Plans propose increased development intensities for residential and non-residential uses within the TOD Plan areas, the TOD Plans would not introduce new large-scale truck-intensive uses such as warehouses or other uses that would place incompatible forms of traffic on the area's road system (e.g., farm equipment). Thus, no impact would result in relation to substantial increases in hazards due to incompatible uses.

f. Wildfire

The Westchester/Veterans and Crenshaw/Imperial TOD Plan areas are within a fully urban setting, have long been developed, and do not contain or abut any natural areas where wildfire

might occur. Therefore, the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would have no impact in relation to wildfire.

ES-5.2 SIGNIFICANT UNAVOIDABLE IMPACTS

As documented in this EIR, implementation of EIR mitigation measures, which will be ensured through a Mitigation Monitoring and Reporting Program, will either eliminate, avoid, or reduce all significant impacts to a less than significant level.

ES-5.3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

a. Land Use and Planning

Threshold LUP-1: Physically divide an existing community.

Impact LUP-1: Development that would be permitted by the proposed Westchester/Veterans and Crenshaw/Imperial Transit Oriented Development Plans would not create any physical barriers that would eliminate or reduce levels of connectivity between existing neighborhoods or within the existing community. The TOD plans would therefore not physically divide an existing community. *No impact* would occur.

Threshold LUP-2: Conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Impact LUP-2: Development that would be permitted by the proposed Westchester/Veterans and Crenshaw/Imperial Transit Oriented Development Plans would not result in any significant environmental effects associated with a conflict between the TOD plans and any existing plan, policy, or regulation that was adopted to avoid or mitigate environmental effects. *No impact* would occur.

b. Population, Housing, and Employment

Threshold POP-1: Induce substantial unplanned population growth.

Impact POP-1: Development permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would generate population and employment growth as the direct result of new transit-oriented residential, commercial, and industrial development within the Westchester/Veterans and Crenshaw/Imperial areas and indirectly by creating a need for housing for new employees within the TOD Plan

areas. The Westchester/ Veterans and Crenshaw/Imperial TOD Plans together propose a greater amount of housing and resulting population than SCAG has projected for Inglewood in Connect SoCal. The employment growth that would result from the proposed TOD Plans do not, however, exceed the employment growth SCAG has projected for Inglewood through 2045. For purposes of analyzing Impact POP-1, the TOD Plans are therefore considered to result in unplanned population growth and planned employment growth. However, the proposed TOD Plans are consistent with the regional policies upon which the projections and regional sustainable communities strategy are based. In addition, due to the TOD Plan's location adjacent to major transit stops, no significant unavoidable impacts would result from the population, housing, and employment growth permitted by the TOD Plans. Impact POP-1 would therefore be *less than significant*.

Threshold POP-2: Displace housing or people, necessitating the construction of replacement housing elsewhere.

Impact POP-2: Development permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would displace approximately 120 existing dwelling units and 331 people. However, because (1) the City's existing housing vacancy rate provides ample housing opportunities for displaced residents in the short-term and (2) the TOD Plans would result in a net increase in available housing of 4,090 dwelling units, a *less than significant impact* would result.

c. Cultural and Tribal Resources

Threshold CUL -1: Cause a substantial adverse change in the significance of a historic resource.

Impact CUL-1: Although no historically significant buildings are planned for demolition and the proposed TOD Plans aim to ensure preservation of existing and potential historic resources, site-specific development projects permitted by the proposed TOD Plans could cause a substantial adverse change in the significance of a historical resource by altering the physical characteristics of an historical resource or those of its physical setting that convey its historical significance. A significant impact would result, requiring mitigation. Implementation of Mitigation Measure CUL-1 would protect those physical characteristics of an historical resource or those of its physical setting that convey its historical significance. Impact CUL-1 would therefore be *significant but mitigable*.

Mitigation Measure CUL-1: Prior to issuance of any permits for projects or demolition activities that would physically affect any listed or potentially eligible historic buildings, structures, or features aged 50 years old or older or negatively affect their historic setting, a cultural resource professional who meets the Secretary of the Interior’s Professional Qualifications Standards for Architectural History shall be retained to determine if the proposed activities would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. The investigation shall include, as determined appropriate by the cultural resource professional and City of Inglewood, the appropriate archival research, including, if necessary, a records search at the South-Central Coastal Information Center (SCCIC) of the California Historical Resources Information System (CHRIS) and a pedestrian survey of the proposed project or activity area to determine if any significant historic period resources would be adversely affected by the proposed action. The results of the investigation shall be documented in a technical report or memorandum that identifies and evaluates any historical resources within the project area and includes recommendations and methods for eliminating or reducing impacts on historical resources. Methods would include, but are not limited to, written and photographic recordation of the resource in accordance with the level of Historic American Building Survey (HABS) documentation that is appropriate to the significance (local, state, national) of the resource. Methods determined to reduce historic impacts, pursuant to the Secretary of the Interiors standards to a less than significant level shall be incorporated into all development plans submitted and included as conditions of approval. In addition, a qualified cultural resource professional shall monitor development activities to ensure that recommended site-specific historic related design measures are followed during construction.

Threshold CUL-2: Cause a substantial adverse change in the significance of an archaeological resource.

Impact CUL-2: Site-specific development and infrastructure projects permitted by the Westchester/Veterans and Crenshaw/Imperial TOD Plans could result in a substantial adverse change in the significance of a previously unknown subsurface archaeological resource during site preparation and grading activities. However, compliance with existing regulations and implementation of Mitigation Measure CUL-2 would reduce this impact

to a less-than-significant level. The impact would therefore be *significant but mitigable*.

Mitigation Measure CUL-2: Prior to the issuance of a grading permit and/or action that would permit site disturbance (whichever occurs first), the applicant/developer shall provide written evidence to the City Planning Division that a qualified archaeologist has been retained to respond on an as-needed basis to address unanticipated archaeological discoveries and any resulting archaeological requirements shall be incorporated into all development plans submitted and also included as conditions of approval. In the event that archaeological materials, including stone tools, shells, bones, glass shards, ceramics, or other materials older than 50 years in age, are encountered during ground-disturbing activities, work in the immediate vicinity of the resource shall cease until a qualified archaeologist has assessed the discovery and appropriate treatment pursuant to CEQA Guidelines Section 15064.5 is determined.

If archaeological resources are found to be significant, the archaeologist shall determine, in consultation with the City and any local Native American groups expressing interest following notification by the City, appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, such as data recovery or other appropriate measures, in consultation with the implementing agency and any local Native American representatives expressing interest in prehistoric or tribal resources. If an archaeological site does not qualify as an historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2.

Threshold CUL-3: Cause a substantial adverse change in the significance of a tribal cultural resource.

Impact CUL-3: Because it is known that the Centinela Valley area, including the TOD Plan areas, contains sites of Native American and early European settlements, unknown subsurface Tribal cultural resources could be present. Thus, it is possible that previously unknown, yet significant, Tribal cultural resources could be encountered below the ground surface during ground disturbance activities. With implementation of Mitigation Measures CUL-2 and CUL-3, this impact would be *significant but mitigable*.

Mitigation Measure CUL-3: If requested by a Native American Tribe asserting the potential presence of a previously unknown Tribal cultural resource (Consulting Tribe), a qualified Native American Monitor with the same authority of the archaeologist identified in Mitigation Measure CUL-2 shall be retained by the developer and present onsite during construction-related ground disturbance activities, including but not limited to, pavement removal, pot-holing or auguring, boring, grading, excavation, trenching, and vegetation removal.

Threshold CUL-4: Disturb any human remains, including those interred outside of formal cemeteries.

Impact CUL-4: Site-specific development projects permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans could disturb previously unknown human remains interred outside of formal cemeteries. However, compliance with existing regulations would ensure that this potential impact would be *less than significant*.

d. Transportation

Threshold TRA-1: Conflict with an applicable program, plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Impact TRA-1: Development permitted by the proposed TOD Plans would provide enhanced bicycle and pedestrian facilities and would also improve access to transit. The resulting impact would be *less than significant*.

Threshold TRA-2: Consistency with CEQA Guidelines Section 15064.3(b).

Impact TRA-2: The mixed-use development proposed for the TOD Plan areas would substantially lower average daily vehicle miles traveled (VMT) per service population within both TOD Plan areas. This due to the location of the Westchester/Veterans and Crenshaw/ Imperial areas within one-half mile of major transit stops along the Metro Crenshaw/LAX line and Green line, respectively; improved access to the stations; and improved pedestrian and bicycle facilities provided for in the TOD Plans. Impacts would therefore be *less than significant*.

Threshold TRA-3: Substantial increase in hazards due to geometric design features or incompatible uses.

Impact TRA-3.1: Site-specific development projects permitted by the proposed TOD Plans would generate increased traffic result at freeway off-ramps within and near the TOD Plan areas. Such increased traffic would not result in traffic backing up from off-ramps onto the freeway mainline. Thus, this impact would be *less than significant*.

Impact TRA-3.2: Site-specific development projects permitted by the proposed TOD Plans would be subject to City and Public Works Department review of proposed roadway improvements, which would ensure that roadway design hazards are not created. *No impact* would result.

Threshold TRA-4: Result in inadequate emergency access.

Impact TRA-4: The proposed TOD Plans would provide adequate emergency access to sites throughout the Plan areas, both during construction of site-specific development projects and ongoing operations. The resulting impact would be *less than significant*.

e. Air Quality

Threshold AQ-1: Conflict with or obstruct attainment of the applicable air quality plan.

Impact AQ-1: Development permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would generate population and employment growth as the direct result of new transit-oriented development within the TOD Plan areas and indirectly by creating a need for housing for new employees. Because population and employment growth that would result from the TOD Plans exceeds

regional growth projections, project-related population and employment growth is considered to be unplanned.

However, the TOD Plans represent the type of high-density mixed use, transit-oriented development that is sought after by the regional SCS and AQMP. The TOD plans would not result in any significant unavoidable impacts and would not increase the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

The proposed TOD Plans are therefore consistent with the Air Quality Management Plan for the South Coast Air Basin and impacts would be *less than significant*.

Threshold AQ-2: **Violate any air quality standard, contribute substantially to an existing or projected air quality violation, or result in cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment.**

Impact AQ-2.1: Construction of site-specific development permitted by the TOD Plans would generate emissions of criteria pollutants exceeding applicable SCAQMD thresholds for ROG and NO_x. Daily unmitigated emissions would also exceed the applicable SCAQMD LSTs for NO_x, PM₁₀ and PM_{2.5} for a one-acre site in Source Receptor Area 3 when more than one site-specific development or infrastructure project is constructed within 82 feet of the same receptor. PM₁₀ and PM_{2.5} emissions would exceed LST thresholds if two or more site-specific development or infrastructure projects are constructed at the same time and within 82 feet of the same receptor. For NO_x, exceedance of the LST threshold would occur if three or more site-specific development or infrastructure projects are constructed within 82 feet of the same receptor at the same time but would not exceed localized significance thresholds for any criteria pollutant.

Compliance with applicable SCAQMD rules and implementation of EIR Mitigation Measures AQ-2.1a and AQ-2.1b would reduce impacts to less than significant. Construction impacts would be *significant but mitigable*.

Mitigation Measure AQ-2.1a: All onsite vehicles and equipment used in construction within the TOD Plan areas that has horsepower greater than 50 shall meet, at a minimum, USEPA Tier IV interim engine certification requirements. If Tier IV interim equipment is not available, the contractor

may apply other available technologies available for construction equipment such that it would achieve a comparable reduction in NO_x and PM emissions comparable to that of Tier IV construction equipment. Where alternatives to USEPA Tier IV are utilized, the contractor shall be required to show evidence to the City that these alternative technologies would achieve comparable emissions reductions. Certifications or alternative reduction strategies shall be required prior to receiving a construction permit.

Mitigation Measure AQ-2.1b: All active construction areas shall be watered at least four times daily to reduce fugitive dust emissions from grading, excavation, and other ground preparation. Watering shall be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water shall be used whenever it is available.

Impact AQ-2.2: Operations of site-specific development permitted by the TOD Plans would generate emissions of criteria pollutants less than applicable SCAQMD thresholds for criteria pollutants for which the region is in non-attainment. Impacts would be *less than significant*.

Threshold AQ-3 **Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).**

Impact AQ-3: The net increase in development that would be permitted by the proposed TOD Plans would increase emissions of criteria pollutants. However, because the level of emissions resulting from the TOD Plans would be less than significant, and TOD Plans are consistent with applicable regional plans aimed at reducing emissions of air pollutants, impacts would be *less than significant*.

Threshold AQ-4: Expose sensitive receptors to substantial pollutant concentrations.

Impact AQ-4.1: The types of uses proposed in the TOD Plans do not include those that would emit TAC emissions in appreciable quantities. However, the TOD Plans each permit new residential uses within 500 feet of a freeway. Because Mitigation Measure AQ-4.1a would ensure health risks associated with such residential development would not have a substantial adverse health effect, the impact would be reduced to less than significant. Impacts would be *significant but mitigable*.

Mitigation Measure AQ-4.1a: Approval of any conversion of single-family residential use to multi-family development within 500 feet of a freeway shall be permitted only if a health risk assessment demonstrates that health risks to residential receptors within the project would have no greater than a 10 in one million increase in cancer risk and no greater than a 1 in one million increase in non-cancer risk.

Impact AQ-4.2: Development permitted by the proposed TOD Plans would not generate a sufficient increase in traffic volumes to produce or substantially contribute to any existing CO hotspot. Impacts would be *less than significant*.

Threshold AQ-5: Create objectionable odors affecting a substantial number of people.

Impact AQ-5: Site-specific development and infrastructure projects permitted by the proposed TOD Plans would introduce new sensitive uses into the TOD Plan areas. Because (1) no new uses are proposed within the TOD Plan areas that would emit objectionable odors that could affect a substantial number of people, (2) compliance with SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses would be required, and (3) any odors emanating from construction sites would be temporary in nature. Impacts would, therefore, be *less than significant*.

f. Greenhouse Gas Emissions

Threshold GHG-1: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Impact GHG-1: The increased development permitted by the proposed TOD Plans would generate emissions of GHGs from construction and from traffic, energy use, and other operations of new site-specific developments. However, GHG emissions from buildout of the TOD Plans, including construction and operational emissions would be substantially less than 40 percent below 1990 per service population emissions for the City of Inglewood, which is reflective of the increased development intensity in transit-oriented mixed-use settings provided by the TOD Plans, along with the TOD Plans' proposed improvements to maximize bicycling and walking. The resulting impact would be *less than significant*.

Threshold GHG-2: Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Impact GHG-2: Site-specific development projects permitted by the proposed TOD Plans would result in an increase in GHG emissions. However, these emissions would be substantially below SCAQMD's proposed efficiency threshold, which indicates compliance with statewide GHG emissions reduction goals. Per service population GHG emissions would also be less than half of Inglewood's citywide 1990 per service population GHG emissions, further indicating compliance with statewide GHG emissions reduction goals. In addition, the TOD Plans provide for enhanced access to transit and improved pedestrian and bicycle facilities and would implement the provisions of the City's ECAP. Thus, impacts would be *less than significant*.

g. Energy Resources

Threshold EN-1: Use large amounts of energy or fuel in a wasteful manner.

Impact EN-1.1: *Construction Impacts.* Site-specific development projects permitted by the proposed TOD Plans would require energy during construction of proposed residential and non-residential uses. However, site-specific development projects will comply with all federal, state, and/or local energy standards, including requirements for upgrading and maintaining construction equipment. Conditions of approval would be placed on site construction to require use of electricity from the adjacent electrical grid rather than onsite diesel generators, address equipment left running when not in use, design of off-road travel routes, and design and use of lighting during construction. As a result, energy usage during construction would not be considered wasteful, inefficient, or unnecessary. The resulting impact would be *less than significant*.

Impact EN-1.2: *Operations Impacts.* The net increase in residential, retail, commercial office, and industrial development that would be permitted by the proposed TOD Plans would increase consumption of energy during operations of new site-specific development. However, new site-specific development would comply with all federal, state, and/or local energy standards. Thus, buildings would comply with CalGreen standards that would require greater energy efficiency than the buildings they replace. As shown in **Table 3.6-2**, the transit orientation and mixed-use character of development proposed in the TOD Plan areas will result in substantially lower average daily VMT per service population than

current development. Thus, vehicular fuel consumption will be substantially lower on a per service population basis than current development within the TOD Plan areas. The TOD Plans' energy usage would not therefore be considered "wasteful," and the impact would be *less than significant*.

Threshold EN-2 Conflict with or obstruct implementation of a State or local plan for non-renewable energy or energy efficiency.

Impact EN-2 Development permitted by the Westchester/Veterans and Crenshaw/Imperial TOD Plans will be required to comply with applicable regulatory requirements set forth in the most recent CalGreen Code and Title 24 requirements as adopted by the City of Inglewood at the time of issuance of building permits. In addition, as demonstrated in Table 3.9-1, development within the TOD Plans will implement all relevant provisions of the Ingles Energy and Climate Action Plan. As a result, the TOD Plans will not conflict with or obstruct implementation of a State or local plan for non-renewable energy or energy efficiency. Impacts would therefore be *less than significant*.

h. Noise and Vibration

Threshold NOI-1: Generate substantial temporary or permanent increase in ambient noise levels in excess of established standards.

Impact NOI-1.1: Site-specific development projects permitted by the proposed TOD Plans would result in temporary increases in noise levels during construction exceeding applicable noise standards. With implementation of EIR mitigation measures, this impact would be *significant but mitigable*.

Mitigation Measure NOI-1.1a: All noise-producing demolition and construction activities shall be restricted to the hours from 7:00 am to 7:00 pm on weekdays and on Saturdays between the hours of 9:00 am and 5:00 pm. In order to reduce potential annoyance to persons using the nearby church and cemetery facilities, no noise-producing construction and demolition activities shall take place on Sundays and holidays.

Mitigation Measure 4-1.1b: Stationary construction equipment shall be placed such that emitted noise is directed away from sensitive receptors nearest the construction site.

Mitigation Measure 4-1.1c: Internal combustion engine-driven equipment shall be equipped with appropriate sound muffling devices,

which are properly maintained and used at all times such equipment is in operation.

Mitigation Measure 4-1.1d: Quiet models of air compressors and other stationary noise sources shall be employed where such technology is commercially available.

Mitigation Measure 4-1.1e: On-site equipment staging areas shall be located so as to maximize the distance between construction-related noise sources and noise sensitive receptors nearest the project site during construction.

Mitigation Measure 4-1.1f: Unnecessary idling of internal combustion engines shall be prohibited.

Mitigation Measure 4-1.1g: During the demolition and site preparation phases of construction, temporary sound barriers a minimum of 8 feet in height shall be placed around the property boundary project property lines to block the line of sight between on-site stationary construction equipment and any adjacent residential or school uses. These temporary sound barriers shall have a minimum Sound Transmission Class (STC) rating of 32 STC.

Impact NOI-1.2: The types of non-residential uses that would occur within the mixed-use settings proposed by the TOD Plans do not typically generate noise levels incompatible with nearby residential uses. However, such mixed-use development might generate higher noise levels than currently exist adjacent to existing sensitive uses. Compliance with Article 2, Section 5-30 of the City Zoning Code would avoid significant impacts related to exceeding the City's exterior noise standards. Impacts *would be less than significant* in relation to land use compatibility.

Although new site-specific development projects permitted by the TOD Plans would increase traffic volumes in the TOD Plan areas, increased noise from such development would result in minor or no increase in average daily noise levels. Impacts would be *less than significant* in relation to roadway noise.

Threshold NOI-2: Generate excessive groundborne vibration or groundborne noise levels.

Impact NOI-2.1: Construction of site-specific development projects permitted by the proposed TOD Plans would result in groundborne vibration levels that would exceed annoyance and potential damage thresholds during construction. Mitigation Measures NOI-2.1a and NOI-2.1b prohibit the

use of construction equipment that generates high levels of vibration within specified distances from existing sensitive land uses and ensures that the construction-related vibration impacts would be reduced to a less than significant level. Mitigation Measure NOI-2.1c protects historic structures within the TOD Plan areas from construction of adjacent site-specific development. Impacts are therefore *significant but mitigable*.

Mitigation Measure NOI-2.1a: Use of large bulldozers, loaded trucks, and caisson drills on construction sites shall be prohibited within 45 feet of existing residential structures and 35 feet of institutional structures. Instead, small rubber-tired bulldozers shall be used within this area during demolition and/or grading operations to reduce vibration effects.

Mitigation Measure NOI-2.1b: The operation of jackhammers shall be prohibited within 25 feet of existing residential structures and 20 feet of institutional structures.

Mitigation Measure NOI-2.1c: Any site-specific development project within 50 feet of an historic building shall engage a qualified structural engineer to conduct a pre-construction assessment of the structural integrity of the nearby historic structure(s) and submit evidence that the operation of vibration-generating equipment associated with the new development would not result in structural damage to the adjacent historic building(s). If recommended by the pre-construction assessment, groundborne vibration monitoring of nearby historic structures shall be required.

Impact NOI-2.2: Proposed development within the TOD Plan areas does not include the types of uses that would involve activities or operation of stationary or mobile equipment that would result in high vibration levels in proximity to sensitive uses. Residential uses are, however, proposed adjacent to the Crenshaw/LAX Metro line and could be subject to vibration from rail operations. The Environmental Impact Statement/Environmental Impact Report prepared for the Crenshaw Transit Corridor Project concluded that no vibration impacts would occur along with Metro line within the City of Inglewood. *No impacts* will result.

Threshold NOI-3: Expose people to excessive airport-related noise within an airport land use plan or within two miles of a public airport of public use airport where such a plan has not been adopted.

Impact NOI-3: Site-specific development projects permitted by the proposed TOD Plans would expose people in the southern portion of the Westchester/

Veterans TOD Plan area to airport-related noise levels from LAX above 65 dB CNEL. Because portions of the Westchester/Veterans TOD Plan area within the 65 dB CNEL noise contour of LAX are designated residential, there is a potential for development of noise-sensitive residential uses. City noise standards consider such uses to be “Conditionally Acceptable” subject to mitigation. The 65 dB CNEL noise contour from Hawthorne Municipal airport does not extend into the Crenshaw/Imperial TOD Plan area. Mitigation Measure NOI-5 requires noise-sensitive development within the 65 dB CNEL of LAX to be designed and to provide noise insulation so as to meet City noise standards. Impacts would therefore be *significant but mitigable*.

Mitigation Measure NOI-3: Require site-specific development projects that include residential uses within the 65 CNEL noise contour of LAX to include appropriate locations for interior private areas and to implement noise reduction measures, such as double pane windows and insulation features to meet the City’s interior noise standards of 45 dBA CNEL.

i. 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.

Impact HAZ-1: Because site demolition and construction activities, as well as operation of proposed new uses permitted by the Westchester-Veterans and Crenshaw-Imperial TOD Plans, would be required to comply with applicable regulations for the handling, use, transportation, and disposal of hazardous materials, neither significant health risks to the public nor environmental hazards would be created. Impacts related to the routine transport, use, or disposal of hazardous materials would therefore be *less than significant*.

Threshold HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.

Impact HAZ-2: The types of residential, retail, and office uses permitted by the TOD Plans are associated with use and storage of common household products with low levels of risk for upset or accidents that would release hazardous materials into the environment. In addition, the TOD Plans would convert approximately 253,639 square feet of existing industrial use to residential, retail, and office uses. Demolition, grading, and

construction activities for site-specific development projects, as well as ongoing operations of uses permitted by the TOD Plans would be required to comply with existing laws and regulations for the transport, use, handling, and disposal of hazardous materials. Such compliance would minimize the potential for upset and accidental releases of hazardous materials. As a result, the impact would be *less than significant*.

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.

Impact HAZ-3: The proposed TOD Plans could permit businesses with the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Compliance with existing laws and regulations would minimize the risks associated with the exposure of sensitive receptors, including schools, to hazardous materials due to routine activities or upset/accident conditions. Therefore, future development that would be permitted by the proposed TOD Plans would result in a *less-than-significant* impact related to the emissions or handling of hazardous materials within the vicinity of schools.

Threshold HAZ-4: Be located on a site that 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.

Impact HAZ-4: Site-specific development projects permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans could include one or more locations included on a list of hazardous materials sites. Compliance with federal, state, and local laws and regulations would require remediation of any such listed site or site that is identified as being affected by hazardous materials. These requirements for remediation would ensure that such sites are remediated prior to their physical development and that public health and the environment are protected from exposure to contaminants. Thus, a *less than significant* impact would result.

Threshold HAZ-5: Result in a safety hazard or excessive noise for people residing or working in the project area for a project located within an airport land use plan or, where such plan has not been adopted, be within 2 miles of a public airport use airport or public use airport.

Impact HAZ-5: The southwestern portion of the Westchester/Veterans TOD Plan area is located within 2 miles of Los Angeles International Airport (LAX) for which an airport land use plan has been adopted. The TOD Plan area is within the 65 dB CNEL for LAX but is outside of identified safety zones. The Crenshaw/Imperial TOD Plan area is outside of the airport influence area for the Hawthorne Municipal Airport. *No impact* related to airport hazards would occur.

Threshold HAZ-6: Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Impact HAZ-6: Site-specific development projects permitted by the proposed TOD Plans would not result in any permanent roadway closures that could present any physical barrier or hinder emergency access. Site-specific development projects permitted by the TOD Plans will be required to conform to applicable California Building Code and Fire Code standards, and the City's would review each site-specific development project to ensure that emergency response plan or emergency implementation of an evacuation plan would not occur. Therefore, the proposed TOD Plans would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be *less than significant*.

j. Hydrology and Water Quality

Threshold HWQ-1: Violate any water quality standards or waste discharge requirements.

Impact HWQ-1.1 Site grading and construction activities would result in short-term increases in the transport of silt and sediment, along with hydrocarbon-based pollutants, to receiving waters. Site construction activities would also allow for infiltration of hydrocarbon and other pollutant discharges into the groundwater. However, compliance with National Pollutant Discharge Elimination System (NPDES) requirements, as well as implementation of a Stormwater Pollution Prevention Plan (SWPPP), including Best Management Practices (BMPs), would avoid the potential to violate any water quality standards or waste discharge requirements. The impact would therefore be *less than significant*.

Impact HWQ-1.2: Following completion of grading and construction activities, urban runoff and waste discharges from streets, parking lots, and other paved areas, as well as runoff from landscaped areas, would carry a variety of pollutants to receiving waters. However, implementation of Best Management

Practices (BMPs) as required to be set forth in the County's MS4 Permit would avoid the potential to violate any water quality standards or waste discharge requirements during ongoing operations. The impact would therefore be *less than significant*.

Threshold HWQ-2: Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

Impact HWQ-2: Site-specific development projects permitted by the proposed TOD Plans would increase the amount of pervious landscaped surface areas and resulting groundwater infiltration, which would be an improvement in groundwater conditions due to landscaping requirements for new development. Thus, development permitted by the TOD Plans would not result in an increase in impervious surface area such that the infiltration of surface water to groundwater would be reduced. Impacts related groundwater recharge and sustainable groundwater management would be *less than significant*.

Threshold HWQ-3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would (i) result in substantial erosion or siltation on- or off-site, (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, or (iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Impact HWQ-3.1: Neither the Westchester/Veterans nor the Crenshaw/Imperial TOD Plan would alter existing drainage patterns. Site-specific development permitted by the TOD Plans would be required to implement all applicable construction regulations and BMPs, minimizing the potential for substantial erosion or siltation during construction. However, providing new landscaping within site-specific development projects and along Green Streets could result in patches of exposed soil immediately following landscape installation until groundcover becomes established with a moderate to high potential for erosion. Implementation of Mitigation Measure HWQ-3.1 would prevent landscape installations from creating temporary erosion hazards following initial installation until groundcover is established. Thus, impacts would be *significant but mitigable*.

Mitigation Measure HWQ-3.1: All portions of landscaping installed as part of site-specific development projects, Green Streets, open space, or infrastructure projects shall be designed to prevent erosion and not result in temporary patches of exposed soil following installation prior to establishment of ground cover.

Impact HWQ-3.2: Neither the Westchester/Veterans nor the Crenshaw/Imperial TOD Plan would alter existing drainage patterns. The TOD Plans would increase the amount of pervious surface area within the TOD Plan areas through requirements for landscaping and a Green Streets program. Site-specific development projects would be required to detain water onsite or drain into storm drains with capacity to accept such drainage. Thus, the TOD Plans would not increase the rate or amount of surface runoff or result in on- or off-site flooding. Impacts would therefore be *less than significant*.

Impact HWQ-3.3: Site-specific development projects permitted by the proposed TOD Plans would introduce water quality pollutants during site grading, construction, and ongoing operations. Future site-specific development projects permitted by the proposed TOD Plans would be required to prepare a SWPPP and implement construction BMPs detailed in the SWPPP during construction, which are designed to protect water quality and thereby avoid significant impacts. With implementation of Source Control and Treatment Control BMPs in accordance with the SUSMP standards and LID development standards, site-specific development projects permitted by the proposed TOD Plans would not result in a substantial degradation of water quality, and impacts would be *less than significant*.

Threshold HWQ-4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

Impact HWQ-4: Neither the Westchester/Veterans, Crenshaw/Imperial TOD Plan areas, nor the City of Inglewood contain any lands (1) within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, or (2) any land areas subject to inundation due to seiche, tsunami, or mudflow. *No impact* would result.

Threshold HWQ-5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Impact HWQ-5: The use of construction equipment and other vehicles could result in spills of oil, grease, gasoline, brake fluid, antifreeze, or other vehicle-

related fluids and pollutants that would adversely affect water quality. Following construction and occupancy of new residential, retail, and employment-generating uses permitted by the TOD Plans, runoff from site-specific development project sites would contain pollutants common in urban runoff, including metals, oils and grease, pesticides, herbicides, nutrients, pet waste, and garbage/litter.

New development within the TOD Plan areas would be required to comply with the NPDES General Construction Permit and Inglewood Municipal Code regulations, which would prevent the substantial degradation of water quality during and after construction of site-specific development projects permitted by the TOD Plans. Because these regulatory requirements are designed to ensure that water quality discharges do not violate State Water Resources Control Board objectives, the TOD Plans would not conflict with or obstruct implementation of a water quality control plan. In addition, West Coast Groundwater Basin, from which the City draws a portion of its overall water supply, has been adjudicated and is not subject to a sustainable groundwater management plan. Impacts would therefore be *less than significant*.

k. Geology, Soils, and Seismicity

Threshold GEO-1: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure including liquefaction, and/or landslides.

Impact GEO-1.1: *Fault Rupture*. Because there are no known active or potentially active faults within the TOD Plan areas, there would be *no impact*.

Impact GEO-1.2: *Strong seismic groundshaking*. Site-specific development projects permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would expose people and structures to strong seismic groundshaking. Because the TOD Plan areas are located in a seismically active region, some risk related to seismic groundshaking would remain, even with compliance with all applicable regulatory standards. However, all site-specific development projects that would be permitted by the TOD Plans would be required to conform to the seismic design parameters of the CBC and would be reviewed by the City as part of the building plan check and development review process. Compliance with the requirements of the CBC and Inglewood Municipal Code for

structural safety would reduce hazards from strong seismic groundshaking to *less than significant*.

Impact GEO-1.3: *Liquefaction and seismic-related ground failure*. Site-specific development projects permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would not expose people and structures to liquefaction or seismic-related ground failure or landslides, including because such hazards are not present within the TOD Plan areas. *No impact* would result.

Impact GEO 1.4: *Landslides*. Because the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plan areas are generally flat, the TOD Plans would not expose people or structures to risk of loss, injury, or life involving landslides. *No impact* would result.

Threshold GEO-2: Result in substantial soil erosion or the loss of topsoil.

Impact GEO-2: Site grading and construction activities associated with site-specific development projects permitted by the TOD Plans could result in short-term increases in the transport of silt and sediment to receiving waters. However, compliance with National Pollutant Discharge Elimination System (NPDES) requirements, as well as implementation of a Stormwater Pollution Prevention Plan (SWPPP), including best management practices (BMPs), would avoid substantial erosion or loss of topsoil. The resulting impact would therefore be *less than significant*.

Threshold GEO-3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

Impact GEO-3: The Westchester/Veterans and Crenshaw/Imperial TOD Plans would permit redevelopment and new development on stable soils in areas that are not susceptible to landslides, lateral spreading, subsidence, liquefaction, or collapse. *No impact* would therefore result.

Threshold GEO-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

Impact GEO-4: The Westchester/Veterans and Crenshaw/Imperial TOD Plans would permit redevelopment and new development on soils expansive soils in some locations. However, compliance with the California Building Code

would resolve expansive soil issues. The resulting impact would therefore be *less than significant*.

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.

Impact GEO-5: The Westchester/Veterans and Crenshaw/Imperial TOD Plans require all permitted development to connect to municipal sewage systems, and no septic tanks or alternative wastewater disposal systems would be used. As a result, *no impact* would result.

Threshold GEO-6: Directly or indirectly destroy a unique paleontological resource or unique geologic feature.

Impact GEO-6: Future development permitted by the proposed Westchester/ Veterans and Crenshaw/Imperial TOD Plans could destroy a previously unknown Future development permitted by the proposed Westchester/ Veterans and Crenshaw/Imperial TOD Plans could destroy a previously unknown unique paleontological resource as the result of future site preparation and grading activities at depths below those of previous development. Because the TOD Plan areas are located on a coastal plain, no unique geologic features could be disturbed. Compliance with existing regulations and implementation of EIR mitigation measures would reduce this potential impact to a less-than-significant level. The impact would therefore be *significant but mitigable*.

Mitigation Measure CUL-6: Prior to the issuance of a grading permit and/or action that would permit site disturbance in native ground (below soils that were disturbed by previous development activities), (whichever occurs first, the applicant/ developer shall provide written evidence to the City Planning Division that a qualified paleontologist has been retained to respond on an as-needed basis to address unanticipated paleontological discoveries, and the paleontological requirements shall be incorporated into all development plans submitted and included as conditions of approval. In the event that paleontological resources are encountered during grading and construction operations, all construction activities shall be halted or redirected to provide for a qualified paleontologist to assess the find for significance and, if necessary, develop a paleontological resources impact mitigation plan (PRIMP) for the review and approval by the City prior to resuming construction activities.

Projects that would not encounter previously undisturbed soils would not be required to retain a paleontologist. However, these projects shall demonstrate non-disturbance to the City through the appropriate construction plans or geotechnical studies prior to any earth disturbing activities.

1. Public Services and Facilities

Threshold PSF-1 **Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.**

Impact PSF-1.1: *Police Services.* The increased residential and non-residential development that would be permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would increase demand for police services during construction and ongoing operations. While increased police staffing would be needed, expansion of the Inglewood Police Department by 14 sworn officers over a period of 20-years would not require new police facilities, or the expansion of existing facilities. Thus, *no impact* would result.

Impact PSF-1.2: *Fire Protection Services.* The increased residential and non-residential development that would be permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would increase demand for fire protection services during construction and ongoing operations. Given (1) the existing developed nature of the TOD Plan areas and the urban level of service already being provided, the location of two stations in proximity to the TOD Plan areas and an additional 10 fire stations within three miles of Inglewood's boundaries, the increased demand for fire protection services resulting from the TOD Plans would not necessitate provision of new facilities or physical expansion of existing fire protection facilities. Thus, *no impact* would result.

Impact PSF-1.3: *Schools.* Buildout of the TOD Plans is anticipated to generate a total of approximately 1,018 K-12 school students, assuming that students within the TOD Plan areas attended privately operated charter schools at the current rate. The addition of 1,018 K-12 school students to IUSD's current enrollment would approximate the District's reported enrollment for the

2014-2015 school year. Payment of development impact fees, as required by Government Code Section 65995 and the Inglewood Unified School District would be required for each site-specific development project permitted by the TOD Plans, which would provide for funding of improvements to (rather than expansion of) existing facilities and would constitute mitigation of impacts related to the provision of school services. Since SB 50 development impact fees the statutory mitigation required for new development and no new or expanded school facilities will be required to house students from the TOD Plan areas, impacts would be *less than significant*.

Impact PSF-1.4: *Libraries*. New residential development within the TOD Plan areas would increase demand for library services and facilities. However, many of the residential units would be equipped with internet access and several multi-family housing complexes might also include computer centers, which would reduce any increased demand for library services and resources. Build out of the proposed TOD Plans would therefore not result in the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts. Therefore, *no impact* would result.

m. Utilities, Service Systems, and Water Supply

Threshold UTI-1: Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects.

Impact UTI-1: Construction of needed water infrastructure would not result in physical environmental effects other than those that would occur as the result of development of proposed uses and improvements within rights-of-way needed for connections to existing water lines adjacent to site-specific development projects. Connections to existing water lines would occur exclusively within existing roadway and alley rights-of-way. While such connections might require roadway lane closures during construction, such closures would be temporary and subject to standard City requirements to ensure public safety and minimal disruption of roadway operations. As a result, impacts related to construction of water facilities would be *less than significant*.

- Impact UTI-1.2: Site-specific development projects permitted by the proposed TOD Plans would generate a net increase of 0.90 mgd of sewage, which represents 0.75 percent of the remaining 120 mgd capacity of the LACSD's Joint Water Pollution Control Plant. Thus, adequate capacity would be available, and the TOD Plans would not require expansion of existing or construction of new wastewater treatment facilities. Construction of needed sewer infrastructure would not result in any on-site physical effects on the environment other than those analyzed as part of development of proposed residential and commercial uses (e.g., site grading). In addition, any necessary off-site sewer improvements would occur exclusively within existing rights-of-way adjacent to site-specific developments. While such connections might require roadway lane closures during construction, such closures would be temporary and subject to standard City requirements to ensure public safety and minimal disruption of roadway operations. As a result, impacts related to construction of sewer facilities would be *less than significant*.
- Impact UTI-1.3: New development that would be permitted by the proposed TOD Plans would be required to provide for detention and infiltration of stormwater pursuant to SUSMP and LID regulations that are designed to reduce and manage stormwater drainage. The SUSMP requires site-specific development projects to conduct a drainage hydrologic/hydraulic analysis and detail the project's anticipated runoff. From this analysis, site-specific development projects are required to ensure that a net increase in peak stormwater flows would not occur. Site-specific development projects are also required through implementation of project-specific WQMPs to detain and treat the storm water quality volume generated by the project. In addition, Inglewood Municipal Code Section 10-208 requires LID standards to reduce runoff through smart growth practices, such as stormwater infiltration, evapotranspiration, biofiltration, and rainfall harvest and use. As a result, *no impacts* related to construction of drainage facilities would occur.
- Impact UTI-1.4: Construction of needed electrical, natural gas, and telecommunications facilities improvements to serve site-specific development and infrastructure projects would not result in any on-site physical effects on the environment other than those that would occur as the result of the development of proposed residential and commercial uses (e.g., site grading) and infrastructure improvements as analyzed throughout this EIR. In addition, off-site connections to existing electrical, natural gas, and telecommunications facilities would occur exclusively within existing

road and alley rights-of-way. While such connections might require roadway lane closures during construction, such closures would be temporary and subject to standard City requirements for utility work within rights-of-way to ensure public safety and minimal disruption to roadway operations. As a result, impacts related to construction of electrical, natural gas, and telecommunications facilities would be *less than significant*.

Threshold UTI-2: Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

Impact UTI-2: New residential, commercial, and employment-generating development permitted by the proposed TOD Plans would increase long-term water demand within the service areas of both the City of Inglewood and Golden State Water Company. While the City projects a surplus of entitled water supply during multiple dry years in 2040 even with development of the TOD Plans, the Golden State Water Company projects sufficient entitled water supply during multiple dry years in 2040 to meet projected demands but no additional capacity to serve the Crenshaw/Imperial TOD Plan. However, because the City projects a surplus water supply of approximately 470 AFY by 2040, sufficient water supplies would be available to serve the proposed TOD Plans from existing entitlements and resources, and new or expanded entitlements would not be required. As a result, impacts related to water supplies would be *less than significant*.

Threshold UTI-3: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Impact UTI-3: Site-specific development projects permitted by the proposed TOD Plans would generate a net increase of 0.90 mgd of sewage, which represents 0.75 percent of the remaining 120 mgd capacity of the LACSD's Joint Water Pollution Control Plant. Thus, adequate capacity would be available. and the impact would be *less than significant*.

Threshold UTI-4: Generate solid waste in excess of State or local standards or the capacity of the landfill serving the project or other local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

Impact UTI-4: Demolition and construction activities would generate a daily average of 4.2 tons of solid waste for landfill disposal. After completion of construction, the TOD Plans will increase the amount of solid waste delivered to landfills by 6.8 tons daily (maximum daily generation of 10.66 tons of solid waste for landfill disposal from the combination of demolition, construction, and operations in the last year of development).

Demolition and construction activities would generate a total of 26,467 tons of solid waste for landfill disposal over the estimated 20-year construction period. A net increase of 42,568 tons of solid waste for landfill disposal by 20 years from the increased land use intensity proposed by the TOD Plans.

Adequate landfill capacity exists on both a daily and long-term basis to accommodate increased solid waste for landfill disposal generated in the TOD Plan areas. Impacts related to landfill capacity would therefore be *less than significant*.

Threshold UTI-5: Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Impact: UTI-5: Land uses within the proposed TOD Plan areas would be required to comply with City waste diversion programs and would not conflict with federal, state, or local statutes or regulations related to solid waste. Therefore, no adverse physical environmental effects would result, and *no impacts* related to solid waste regulations would occur.

n. Recreational Resources

Threshold REC-1: Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Impact REC-1: New residential development permitted by the proposed TOD Plans would increase demand for parks and recreational facilities within the City. Based on the City's 3.0 acres per 1,000 population standard for provision of park and recreational facilities, 33.87 acres would be needed for the residential development proposed in the TOD Plans. The TOD Plans includes provision of 30.7 acres of park and recreational facilities, resulting in a deficit of 3.17 acres of dedicated park land. Because site-specific residential development projects permitted by the TOD Plans would include private onsite open space and/or recreation facilities, and would be required pay the City's Park Land Dedication In-Lieu Fees and

Park Development Fees pursuant to Municipal Code Section 12-105.5 to make up for the deficit in dedicated park land, the proposed TOD Plans would provide sufficient park and recreational facilities such that substantial physical deterioration would not occur or be accelerated. Impacts would therefore be *less than significant*.

Threshold REC-2: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impact REC-2: Construction and operation of proposed parks and recreation facilities would contribute to impacts addressed throughout this EIR, except for those impacts specifically related to population growth, except for those impacts specifically related to population growth or to the operations of proposed uses. The significance of these impacts would be as identified in other EIR sections.

ES-6 ALTERNATIVES

CEQA requires that an EIR describe a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project, while avoiding or reducing the significant environmental effects of the proposed Project and to evaluate the comparative merits of the alternatives. Chapter 7 also evaluates alternatives to the proposed Project as required by CEQA. These alternatives include:

- **No Project.** The No Project Alternative assumes that the proposed TOD Plans are not adopted. Adaptive reuse of existing buildings would occur, as would a minimal amount of development on existing vacant and underutilized sites.
- **Reduced Intensity Transit Oriented Development.** Under this alternative, the proposed TOD Plans would be approved with an approximately 25 percent lower net increase in development.
- **Low Intensity Development.** Under this alternative, the proposed TOD Plans would be approved with an approximately 50 percent lower net increase in development.

ES-6.1 NO PROJECT ALTERNATIVE

The No Project Alternative assumes that the proposed TOD Plans are not adopted, and that existing conditions would largely continue. None of the TOD Plan components described in Chapter 3, *Project Description*, would be approved, and there would be no further development within the TOD Plan areas other than existing development approvals, adaptive reuse of existing buildings, and a minimal amount of development on currently vacant sites pursuant to

current General Plan and zoning requirements. This alternative is intended to meet the requirements of CEQA Guidelines Section 15126.6(e) for evaluation of a no project alternative. The net increase in development under this alternative would be:

- Residential: 400 multi-family dwelling units
- Retail: 25,000 square feet
- Office: 300,000 square feet

ES-6.2 REDUCED INTENSITY TRANSIT ORIENTED DEVELOPMENT ALTERNATIVE

Development under the Reduced Intensity TOD Alternative would reduce the net increase of development within the Westchester/Veterans and Crenshaw/Imperial areas as a means of reducing the significant unavoidable traffic impacts of the proposed TOD Plans. Under this alternative, the proposed TOD Plans would be approved, but with a 25 percent reduction in the net development increase of the proposed TOD Plans. Future development permitted by the Reduced Intensity TOD Alternative would largely consist of existing development approvals, adaptive reuse of existing buildings, and development on currently vacant and underutilized sites.

The net increase in development under the Reduced Intensity TOD Alternative would be:

- Residential: 3,067 multi-family dwelling units
- Commercial: 529,475 square feet

ES-6.3 LOW INTENSITY DEVELOPMENT ALTERNATIVE

Development under the Low Intensity Development Alternative would substantially reduce the net increase of development within the Westchester/Veterans and Crenshaw/Imperial areas as a means of reducing significant unavoidable traffic impacts of the proposed TOD Plan. Under this Alternative, the proposed TOD Plans would be approved, but with approximately half of the net increase in development within the Westchester/Veterans and Crenshaw/Imperial areas compared to the proposed TOD Plans. The net increase in development under the Low Intensity Development Alternative would be:

- Residential: 2,045 multi-family dwelling units
- Commercial: 352,980 square feet

ES-6.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires that an EIR identify an environmentally superior alternative. If the No Project Alternative is identified as the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives (CEQA Guidelines Section 15126.6(e)(2)). In the case of the TOD Plans, the No Project Alternative, would be environmentally superior since it reduces or avoids the significant traffic effects of the TOD Plans and reduces nearly all other environmental effects.

Of the other alternatives evaluated in this EIR, the Low Intensity Development Alternative would be the environmentally superior alternative since it involves minimal impacts compared to the proposed TOD Plans and meets most project objectives albeit not to the same degree as do the proposed TOD Plans.

ES-7 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

CEQA Guidelines Section 15123 specifies that the EIR summary shall identify “areas of controversy” known to the Lead Agency, including issues raised by agencies and the public, and issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects. To date, the following areas of controversy and issues to be resolved have been identified in relation to the Westchester/Veterans and Crenshaw/Imperial TOD Plans.

- Potential for “gentrification” and increased rents for existing residents and businesses.
- Affordability of the housing to be constructed within the TOD areas.
- Traffic congestion.

This environmental impact report EA-EIR-2021-066 (EIR) has been prepared by the City of Inglewood (“City” or “Inglewood”) as the Lead Agency in conformance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 *et seq.*) and CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000 *et seq.*). The EIR identifies, analyzes, and mitigates the significant environmental effects of Transit Oriented Development (TOD) Plans, along with corresponding General Plan Amendments and zone changes for the Westchester/Veterans and Crenshaw/Imperial planning areas being proposed by the City of Inglewood (**Figure 1-1**). The TOD Plans, as articulated in Chapter 2, *Project Description*, involve plans and programs to enhance the Westchester/Veterans and Crenshaw/Imperial areas and to maximize use of transit along Metro’s Crenshaw/LAX Line, which is currently under construction (Westchester/Veterans area), as well as to maximize use of transit along the existing Metro Green Line (Crenshaw/Imperial area).

CEQA requires each EIR to reflect the independent judgment of the Lead Agency, including but not limited to the thresholds of significance used to analyze project impacts, analyses, and conclusions regarding the level of significance of impacts both before and after mitigation, and the mitigation measures to be implemented to avoid or reduce project-related impacts¹. In preparing this EIR, Inglewood has employed CEQA practitioners and environmental technical specialists. However, the thresholds of significance, environmental analyses, and conclusions set forth in this EIR reflect the independent judgment of the City of Inglewood.

1.1 OVERVIEW OF WESTCHESTER/VETERANS AND CRENSHAW/IMPERIAL TOD PLANS

1.1.1 LOCATION OF THE TOD PLAN AREAS

Figure 1-1 indicates the location of the Westchester/Veterans and Crenshaw/Imperial planning areas. The Westchester/Veterans planning area consists of approximately 432 acres generally encompassing the area within the City of Inglewood that is within a half-mile of the Westchester/ Veterans Metro Station, which is currently under construction at the Florence Avenue/Hindry Avenue intersection. The Crenshaw/Imperial planning area consists of approximately 221 acres located north of the Crenshaw Boulevard interchange along the I-105 freeway, and generally encompasses the area within the City of Inglewood that is within a half-mile of the Crenshaw Metro Green Line Station.

¹ CEQA §§21082.1 (c)(2) and (3), CEQA Guidelines §§15084 (e) and 15090 (a)(3).

1.2 CHARACTERISTICS OF THE PROPOSED TOD PLANS

The Westchester/Veterans TOD Plan is proposed to replace existing General Plan land use designations for that planning area with a single “Westchester/Veterans Transit Oriented District” designation. The Crenshaw/Imperial will similarly replace existing General Plan land use designations for that planning area with a single “Crenshaw/Imperial Transit Oriented District” designation. Both TOD Plans provide detailed land use plans and policy direction for appropriate uses and development intensity within each planning area, including enhanced pedestrian and bicycle mobility and improved access to the Metro transit stations that are at the center of each planning area. The TOD Plans also provide for the creation of new and enhancement of existing public spaces within the Westchester/Veterans and Crenshaw/Imperial areas.

The TOD Plans each include modifications to existing zoning designations to provide form-based development regulations that are integrated with design guidelines to maximize use of transit, bicycling, and walking within the Westchester/Veterans and Crenshaw/Imperial areas. These regulations provide for increased development intensity in mixed use settings, along with expansion of employment-generating uses, particularly in the Westchester/Veterans area. Recognizing the transit orientation of new development within the Westchester/Veterans and Crenshaw/Imperial areas, proposed zoning regulations include reductions in minimum parking requirements for uses that are most amenable to transit use. Overall, the TOD plans provide for increased residential and commercial/office use, along with modernization of existing retail development. The specific types of development proposed for the Westchester/Veterans and Crenshaw/Imperial areas are described in **Table 2-1**, Proposed Development and **Table 2-2**, Proposed Development Summary.

1.3 ENVIRONMENTAL REVIEW

The Westchester/Veterans and Crenshaw/Imperial TOD Plans require amendments to the City’s General Plan, Zoning Map, and Zoning Code. Because approval of the General Plan, Zoning Map, and Zoning Code require discretionary actions by the City, each plan constitutes a “project” under CEQA, and must be evaluated for its potential to create adverse environmental effects.

Consistent with CEQA requirements, this EIR assesses the direct and indirect environmental impacts associated with the physical changes that would result from development permitted by the Transit Oriented Development Plans for the Westchester/Veterans and Crenshaw/Imperial areas. Additionally, this EIR sets forth all feasible mitigation measures and evaluates a reasonable range of alternatives to address identified significant impacts. The City of Inglewood is required to consider the information provided in this EIR, along with any other relevant information, in making its decisions regarding the TOD Plans.

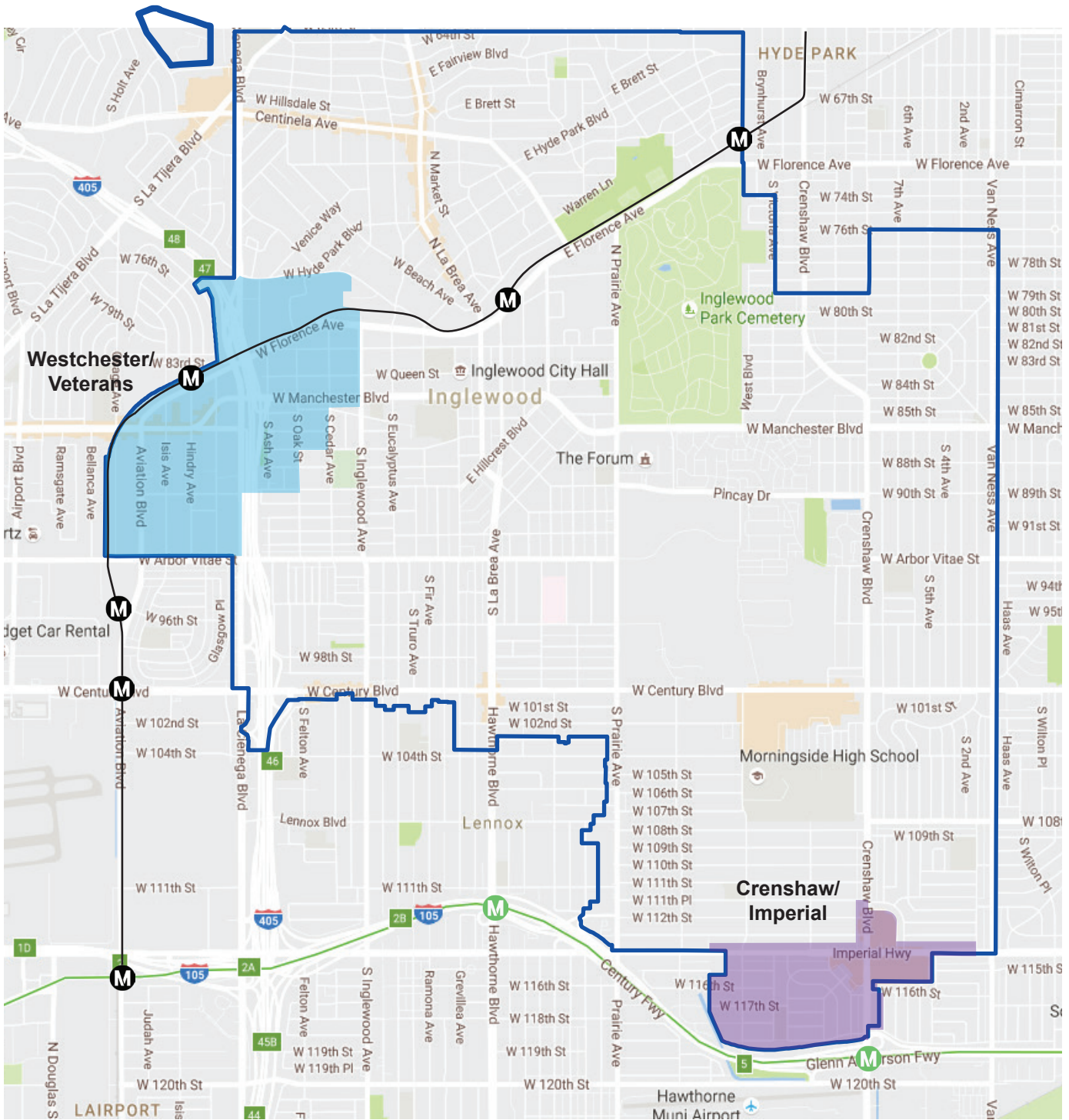



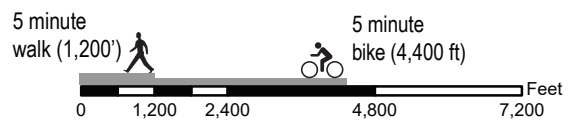
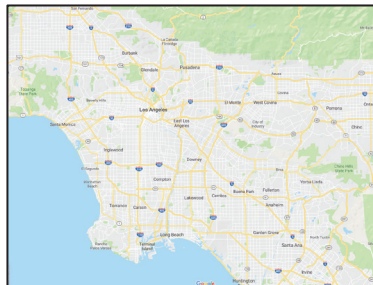


FIGURE 1-1
Transit-Oriented Development Plan Areas

-  City Boundary
-  Green Line
-  Future Crenshaw/LAX Line
- Aa** Current TOD Plan Areas

Regional Location



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1.3.1 PURPOSE AND INTENDED USE OF THIS EIR

Pursuant to the provisions of CEQA Guidelines Section 15121 (a), this EIR is intended as an informational document to inform public agency decision makers and the general public of the physical environmental effects of the Westchester/Veterans and Crenshaw/Imperial TOD Plans, determine the significance of these impacts, identify feasible measures to avoid or minimize those significant effects, and describe reasonable alternatives to the project that might avoid or lessen significant environmental effects of the TOD Plans.

State CEQA Guidelines provide the following information regarding the purpose of an EIR:

- **Project Information and Environmental Effects.** An EIR is an informational document to inform public agency decision-makers and the general public of the significant environmental effect(s) of a project, identify feasible measures to avoid or minimize those significant effects, and describe reasonable alternatives to the project. The public agency undertaking preparation of an EIR is required to consider the information in the EIR along with other information that may be presented to the agency prior to taking any action to approve the project or approve it with modifications (CEQA Guidelines Section 15121(a)).
- **Standards for Adequacy of an EIR.** An EIR should be prepared with a sufficient degree of analysis to enable decision makers to make an intelligent decision that takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate. Where such disagreement exists, the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure (CEQA Guidelines Section 15151).

As a public disclosure document, the purpose of an EIR is not to recommend approval, modification, or denial of a project or to determine whether a project is “good” or “bad.” The purpose of an EIR is to provide information regarding the physical environmental changes that would result from an action being considered by a public agency to aid in the agency’s decision-making process.

1.3.2 EXEMPTIONS AND STREAMLINING FOR INFILL PROJECTS

a. CEQA Exemptions for Infill Development

Because of the developed urban character of the Westchester/Veterans and Crenshaw/Imperial areas, many future projects subject to the Transit Oriented Development Plans may be eligible for categorical exemptions from CEQA. Section 15332 of the CEQA Guidelines describes infill

projects that are categorically exempt from the provisions of CEQA. To be exempt, infill projects must:

- Be consistent with the applicable General Plan designation and all applicable General Plan policies, as well as with the applicable zoning designation and regulations;
- Occur within the city limits on a project site of no more than 5 acres substantially surrounded by urban uses;
- Have no value as habitat for endangered, rare, or threatened species;
- Not result in any significant effects relating to traffic, noise, air quality, or water quality; and
- Be able to be adequately served by all required utilities and public services.

b. Streamlining of CEQA Documentation for Infill Projects

CEQA Guidelines Section 15183.3 streamlines the environmental review process for eligible infill projects by limiting the topics subject to review or exempting certain projects from CEQA review where the effects of infill development have been addressed in a planning level decision or by uniformly applicable development policies.

To be eligible for such streamlining, an infill project must:

- Be located in an urban area on a previously developed site or a site that adjoins existing qualified urban uses on at least 75 percent of its perimeter;
- Satisfy the following performance standards in CEQA Guidelines Appendix M.
 - Implement all of the following:
 - **Renewable Energy.** All non-residential projects shall include onsite renewable power generation, such as solar photovoltaic, solar thermal and wind power generation, or clean backup power supplies, where feasible. Residential projects are also encouraged to include such onsite renewable power generation.
 - **Soil and Water Remediation.** If the project site is included on any list compiled pursuant to Section 65962.5 of the Government Code, the project shall document how it has remediated the site if remediation is completed. Alternatively, the project shall implement the recommendations provided in a preliminary endangerment assessment or comparable document that identifies remediation appropriate for the site.

- **Residential Units Near High-Volume Roadways and Stationary Sources.** If a project includes residential units located within 500 feet, or other distance determined to be appropriate by the local agency or air district based on local conditions, of a high-volume roadway or other significant sources of air pollution, the project shall comply with any policies and standards identified in the local general plan, specific plan, zoning code or community risk reduction plan for the protection of public health from such sources of air pollution. If the local government has not adopted such plans or policies, the project shall include measures, such as enhanced air filtration and project design, that the lead agency finds, based on substantial evidence, will promote the protection of public health from sources of air pollution. Those measure may include, among others, the recommendations of the California Air Resources Board, air districts, and the California Air Pollution Control Officers Association.
- Residential developments must also satisfy one of the following:
 - *Projects achieving below average regional per capita vehicle miles traveled (VMT).* A residential project is eligible if it is located in a “low vehicle travel area” within the region.
 - *Projects located within ½ mile of an Existing Major Transit Stop or High-Quality Transit Corridor.* A residential project is eligible if it is located within ½ mile of an existing major transit stop or an existing stop along a high-quality transit corridor.
 - *Low-Income Housing.* A residential or mixed-use project consisting of 300 or fewer residential units all of which are affordable to low income households is eligible if the developer of the development project provides sufficient legal commitments to the lead agency to ensure the continued availability and use of the housing units for lower income households, as defined in Section 50079.5 of the Health and Safety Code, for a period of at least 30 years, at monthly housing costs, as determined pursuant to Section 50053 of the Health and Safety Code.
- Commercial/retail developments area must also satisfy one of the following:
 - *Regional Location.* A commercial project with no single-building floor-plate greater than 50,000 square feet is eligible if it locates in a “low vehicle travel area.”
 - *Proximity to Households.* A project with no single-building floor-plate greater than 50,000 square feet located within one-half mile of 1800 households is eligible.

- Office Buildings, whether commercial or public must also satisfy one of the following:
 - *Regional Location.* Be located in a low vehicle travel area.
 - *Proximity to a Major Transit Stop.* Be located within ½ mile of an existing major transit stop, or ¼ mile of an existing stop along a high-quality transit corridor.

Pursuant to CEQA Guidelines Section 15183.3 (c), following certification of the Final EIR and adoption of the TOD Plans, CEQA would not apply to site-specific development projects within the Westchester/Veterans and Crenshaw/Imperial planning areas under two circumstances:

- Significant unavoidable effects addressed in this EIR need not be analyzed again.
- Environmental effects need not be analyzed whether or not they were analyzed in this EIR or if the effect would be more significant for the site-specific development project than was analyzed in this EIR, if the City makes a finding that uniformly applicable development policies or standards that it has adopted apply to the site-specific development project and would substantially mitigate that effect.

Per CEQA Guidelines Section 15183 (c), streamlining under this section could confer complete exemption from CEQA depending on the effects addressed in the prior EIR and the availability of uniformly applicable development policies or standards. It is therefore the intent of this EIR and the TOD Plans to address the environmental effects of future infill development within the TOD Plan areas as comprehensively as possible. As stated in CEQA Guidelines Section 15183 (c), “with a good and detailed analysis of such development, the effects of many infill projects could be found to have been addressed in the prior EIR, and no further environmental documents would be required.”

1.3.3 PROGRAM ENVIRONMENTAL IMPACT REPORT

Because the physical environmental effects of the Westchester/Veterans and Crenshaw/Imperial TOD Plans will result from a series of site-specific development and infrastructure projects occurring at different times and at different locations within the TOD Plan areas over an anticipated 20-year time frame, a “program” EIR is being prepared pursuant to the requirements of CEQA Guidelines Section 15168. No site-specific developments or infrastructure projects are proposed at this time.

The proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans provide a policy framework for future site-specific development and infrastructure projects that would be (1) geographically related, (2) logical parts in a chain of contemplated actions, (3) connected as part of a continuing program, and (4) carried out under the same regulatory authority and

having similar environmental impacts that can be mitigated in similar ways (CEQA Guidelines Section 15168). Thus, preparation of a Program EIR is appropriate.

1.3.3 ENVIRONMENTAL REVIEW PROCESS

a. Notice of Preparation

Pursuant to the requirements of CEQA, the City of Inglewood, as Lead Agency, prepared a Notice of Preparation (NOP), including a project description (Appendix A). The NOP indicated that an Environmental Impact Report (EIR) was being prepared and was circulated for the required 30-day public review beginning on October 31, 2017. The NOP requested members of the public and public agencies to provide input on the types of environmental analyses that should be included in the EIR being prepared by the City of Inglewood. There was a 30-day public review period, during which comments regarding environmental documentation for the proposed TOD Plans were received by the City. The public review period closed November 29, 2017. Written comments on the NOP that were provided to the City are included in Appendix A and summarized in **Table 1-1**, which also includes a reference to the EIR section in which issues are addressed.

TABLE 1-1: SUMMARY OF NOP COMMENT LETTERS

Issues	Relevant EIR Sections
Native American Heritage Commission – November 8, 2017	
The NAHC noted that CEQA was amended in 2014 to include Tribal Cultural Resources as a separate category of cultural resources to be addressed in the EIR pursuant to the provisions of AB 52. To that end, the NAHC recommended that consultation with “all California Native American tribes that are traditionally and culturally affiliated with the geographic area” of the proposed TOD Plans. The NAHC also noted that tribal consultation would be required pursuant to both AB 52 and AB 18. The NAHC with requested that Tribal Cultural Resources be addressed in the EIR.	3.5 Cultural Resources
Inglewood Historic Preservation Alliance – November 2017	
Westchester-Veterans Station. Clear directions from the station to the Centinela Adobe should be provided as part of the proposed TOD Plans. Crenshaw-Imperial Station. The Crenshaw-Imperial Branch Library and the Brolly Hut Restaurant should be recognized as historic points of interest.	3.5 Cultural Resources
City of Hawthorne – November 29, 2017	
A collaborative approach between the cities of Inglewood and Hawthorne was requested to address proposed improvements that are either within or adjacent to the City of Hawthorne. The EIR should therefore address jurisdictional authorities and the process to implement any improvements within Hawthorne’s boundaries. Traffic counts and the traffic analysis undertaken for the TOD Plan should include the Crenshaw interchange on the I-105, as well as the intersection of Crenshaw Boulevard and 120 th Street.	2. Project Description 3.6 Traffic and Transportation
Caltrans - November 29, 2017	
Caltrans noted that SB 743 has mandated that CEQA review of transportation impacts address vehicle miles travelled rather than congestion metrics. In addition, Caltrans noted	3.6 Traffic and Transportation

Issues	Relevant EIR Sections
<p>its support for prioritizing and allocating space for bicycling and transit, as well as its support for complete street programs, including safety measures for bicyclists. The Caltrans letter encourages the Lead Agency to evaluate the potential for Transportation Demand Management strategies, as well as Intelligent Transportation Systems applications.</p> <p>Due to the size of the proposed TOD Plans and their location in proximity to the I-405 and I-105 freeways, Caltrans requested the EIR contain an operational analysis of impacts along with appropriate mitigation for TOD Plan-related queueing, weaving, and speed differential effects for freeway, ramp, and surface street intersections within 1.5 miles of the TOD Plans site. Such analysis should include existing traffic, traffic generated by the proposed that would occur on State facilities, cumulative projects traffic, and increases in background traffic.</p>	

Pursuant to Section 15082 (c) (1) of State CEQA Guidelines, the City of Inglewood hosted a public scoping meeting to provide an opportunity for members of the public and public agencies to give input as to the scope and content of the environmental information and analysis to be included in the EIR for the proposed TOD Plans for the Westchester/Veterans and Crenshaw/Imperial areas. The scoping meeting was held on November 14, 2017 in the Community Room at Inglewood City Hall.

Issues that members of the public raised at the November 14, 2017 scoping meeting include:

- The EIR should identify “points of interest” in addition to historic resources.
- Issues related to the quality of domestic water in the Golden State Water Company service area should be addressed.
- Access to the Centinela Adobe should be improved.

b. Availability and Review of the Draft Program EIR

The City of Inglewood filed a Notice of Completion with the Governor’s Office of Planning and Research, State Clearinghouse, indicating that this EIR has been completed and is available for review. A Notice of Availability of the EIR was published concurrently with distribution of this document. The Draft Program EIR for the proposed TOD Plans for Westchester/Veterans and Crenshaw/Imperial is being distributed directly to agencies, organizations, and interested groups and persons for comment during the formal public review period in accordance with Sections 15085, 15086, and 15087 of state CEQA Guidelines. The Draft Program EIR is available for review at the following locations:

- Inglewood City Hall, Planning Division, One Manchester Boulevard, 4th Floor, Inglewood, CA 90301
- Inglewood Public Library, One Manchester Boulevard, Fourth Floor, Inglewood, CA 90301

- TOD Plans Website: <http://inglewood.arroyogroup.com>
- City of Inglewood Website: <https://www.cityofinglewood.org/1016/Environmental-Documents>

Materials referenced in this Draft Program EIR are available for review at Inglewood City Hall, Planning Division, One West Manchester Boulevard, Fourth Floor, Inglewood, CA 90301.

During the 45-day public review period, which begins on May 27, 2021 and ends at 5:30 p.m. on July 12, 2021 (by which time comments on the Draft Program EIR need to be received by the City of Inglewood), written comments regarding the content, analyses, and conclusions of the Draft Program EIR may be submitted to the City of Inglewood. These comments should focus upon the sufficiency of this Draft Program EIR in identifying and analyzing the possible impacts on the environment that would result from the proposed TOD Plans for the Westchester/Veterans and Crenshaw/Imperial areas, and the ways in which significant effects on the environment might be avoided or mitigated (CEQA Guidelines Section 15204(a)).

Comments on the Draft Program EIR should be sent to:

Mindy Wilcox, AICP, Planning Manager
City of Inglewood Planning Division
One West Manchester Boulevard, Fourth Floor
Inglewood, CA 90301

mwilcox@cityofinglewood.org

c. Preparation of the Final EIR

Following the close of the public review period for the Draft Program EIR, the City of Inglewood will prepare a Final EIR in conformance with the CEQA and state CEQA Guidelines. According to *CEQA Guidelines*, Section 15132, the Final EIR shall consist of:

- (a) The Draft Program EIR or a revision of the Draft Program EIR;
- (b) Comments and recommendations received on the Draft Program EIR during the public review period;
- (c) A list of persons, organizations, and public agencies commenting on the Draft Program EIR;
- (d) The responses of the lead agency to significant environmental points raised in the review and consultation process; and
- (e) Other information necessary as determined by the lead agency.

1.4 DEFINITIONS OF KEY CEQA TERMINOLOGY

Less than Significant Impact: Includes any change in physical environmental conditions, such as land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance that would result either directly or indirectly due to implementation of a proposed project, but that does not meet the definition of a “significant impact” set forth in CEQA Guidelines, Section 15382.

Mitigation: Actions which address an adverse environmental impact by either (1) avoiding the impact; (2) reducing or minimizing the magnitude, scope, or intensity of the impact; or (3) compensating for the impact by replacing or substituting for the [natural] resource, or ecological functions, which are impaired, suspended, or eliminated.

No Impact: Occurs when implementation of a proposed project would no result either directly or indirectly in a change in a physical environmental condition, such as land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance.

Significance Criteria, Threshold of Significance: The criteria used in this EIR to determine whether an impact is or is not “significant” are based on (a) CEQA-stipulated “mandatory findings of significance,” which are specific conditions that the Legislature and the Secretary of Resources have determined constitute a significant effect on the environment, and are listed in CEQA Guidelines Section 15065; (b) the criteria outlined in CEQA Guidelines Appendix G; and/or (c) commonly accepted practice and the independent judgment of the Lead Agency in instances where CEQA Guidelines do not set forth a relevant criterion.

Significant Impact: Includes any substantial adverse change in physical environmental conditions, such as land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance that would result either directly or indirectly due to implementation of a proposed project (CEQA Guidelines, Section 15382). An economic or social change by itself is not typically considered to be a significant impact, even if such is substantial. However, social or economic changes related to a physical environmental change may be considered in determining whether the physical change is significant (CEQA Guidelines, Section 15382). The term “significant impact” denotes that mitigation would be required. With implementation of mitigation measures, an impact is referred to as being either “significant but mitigable” or “significant unavoidable.”

Significant but Mitigable Impact: Includes significant impacts for which implementation of required mitigation measures would effectively reduce a significant to a less than significant level.

Significant Unavoidable Impact: Includes those significant adverse environmental impacts for which either no mitigation is feasible or for which implementation of all feasible mitigation would not reduce the impact to a less than significant level.

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2.1 INTRODUCTION

The City of Inglewood is proposing Transit Oriented Development (TOD) Plans, along with corresponding General Plan Amendments and changes of zone, for approximately 653 acres encompassing two areas: Westchester/Veterans and Crenshaw/Imperial (see **Figure 2-1**). These TOD Plans would define and implement the City's vision to (1) enhance the quality and economic vitality of the Westchester/Veterans area, which is the western gateway to the City of Inglewood, and (2) protect and enhance the environment of the Crenshaw/Imperial area as a safe, well maintained, and attractive community.

2.1.1 LOCATION OF THE TOD PLAN AREAS

As shown in **Figure 2-2**, the Westchester/Veterans TOD Plan area consists of approximately 432 acres located at the western gateway to Inglewood along the new Crenshaw/LAX Metro rail line. The TOD Plan area generally encompasses the area within the City of Inglewood that is within one-half mile of the Westchester/Veterans Metro Station, which is currently under construction at the intersection of Florence Avenue and Hindry Avenue. The Crenshaw/Imperial TOD Plan area consists of approximately 221 acres located north of the Crenshaw Boulevard interchange with the I-105 freeway (See **Figure 2-3**). This TOD Plan area generally encompasses the area within the City of Inglewood that is within one-half mile of the Crenshaw Metro Green Line Station.

2.1.2 OVERVIEW OF THE PROPOSED TOD PLANS

The primary impetus for the TOD Plans is to maximize economic development opportunities and enhance the use of Inglewood's convenient transit connections to Los Angeles International Airport, Downtown Los Angeles, Santa Monica, and the entire Los Angeles County area.

The proposed Transit Oriented Development Plans for the Westchester/Veterans and Crenshaw/Imperial areas are intended to implement the following vision:

- The Westchester/Veterans Transit Oriented Development Area will be:
 - A source of quality employment opportunities for residents of Inglewood based on access to transit, LAX, TechTown, and Downtown Inglewood;
 - A western gateway to the City of Inglewood that is friendly to pedestrians (including the disabled), cyclists, transit users, automobiles, and trucks;

- A revenue-generating area that supports the City's economy and the delivery of public services;
- An area for makers of art and technology; and
- An area with unique open space resources serving both nearby employees and residents of the City.
- The Crenshaw/Imperial Transit Oriented Area will be:
 - A complete neighborhood hub providing housing, shopping, education, and recreation for residents of all ages and households of all types;
 - A southern gateway to the City of Inglewood for transit users, pedestrians, cyclists, and drivers facilitating safe and easy access to destinations by foot or bike; and
- A safe, well-maintained, unified, and attractive community center with a unique sense of place.

The TOD Plans for the Westchester/Veterans and Crenshaw/Imperial areas are intended to capture opportunities generated by the Metro Crenshaw/LAX Line and Green Line for the community's accessibility, and to capture the land use and economic development opportunities such accessibility brings. Included in the General Plan Amendment for the TOD Plans will be revisions to proposed land uses to take advantage of higher density mixed use development opportunities adjacent to the two Metro stations.

Existing General Plan land use designations for the Westchester/Veterans TOD Plan area will be replaced with a single "Westchester/Veterans Transit Oriented District" designation, and existing General Plan land use designations for the Crenshaw/Imperial TOD Plan area will be replaced with a single "Crenshaw/Imperial Transit Oriented District" designation. Proposed Concept Plans for the two TOD Plan areas provide detailed land use plans and policy direction for appropriate uses and development intensity for each area. The proposed Concept Plans also provide for enhanced pedestrian and bicycle mobility within the two areas, along with improved access to the Metro stations that are at the center of each TOD Plan area. The proposed Concept Plans also provide for the creation of new, and enhancement of existing, public spaces within the Westchester/Veterans and Crenshaw/Imperial areas.

The proposed TOD Plans also involve modifications to existing zoning designations to provide form-based development regulations integrated with design guidelines aimed at maximizing use of transit, bicycling, and walking within the Westchester/Veterans and Crenshaw/Imperial areas. These regulations set forth opportunities for increased development intensity in mixed use settings, along with expansion of employment-generating uses, particularly in the Westchester/Veterans area. Recognizing the intended transit orientation of new development within the Westchester/Veterans and Crenshaw/Imperial areas, proposed zoning regulations

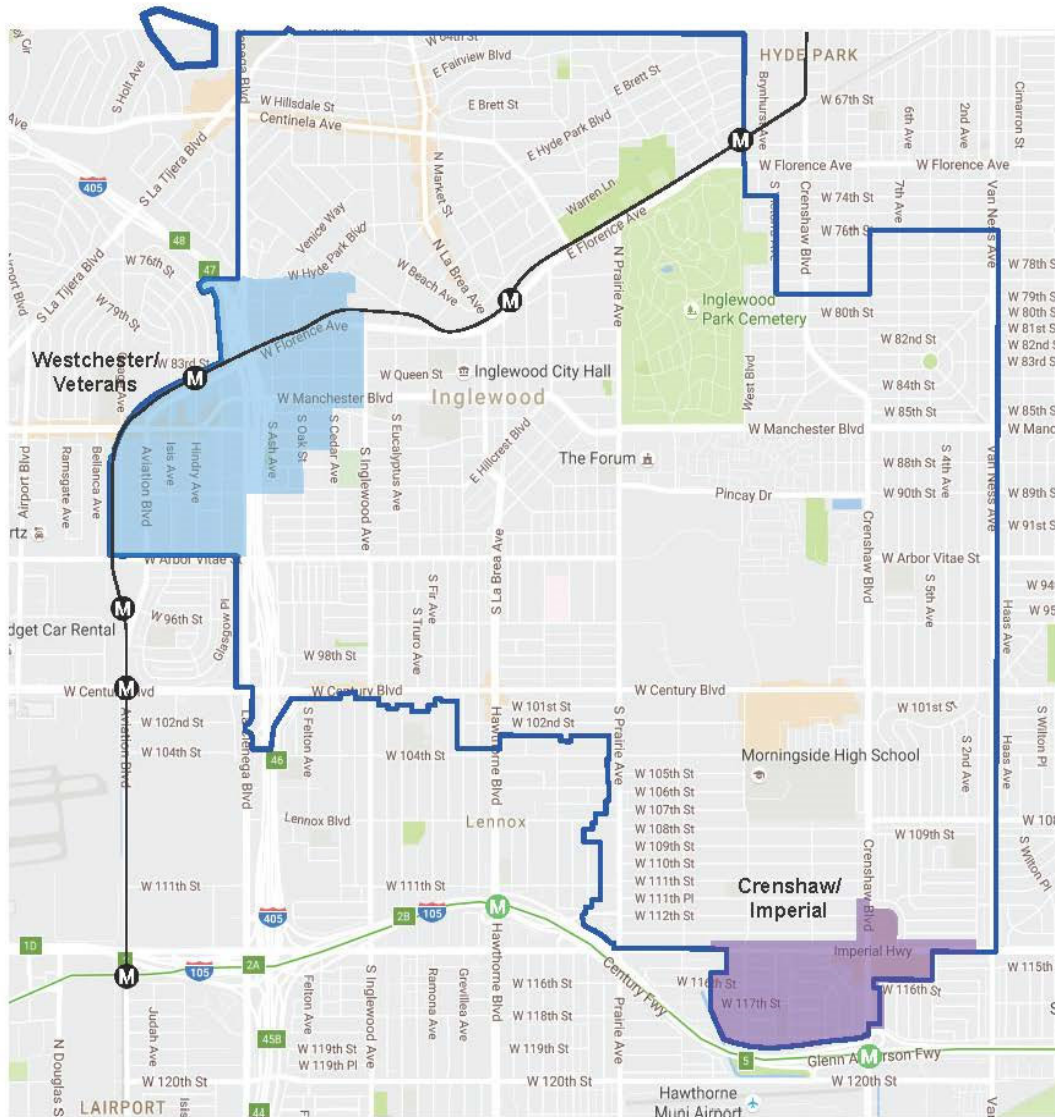
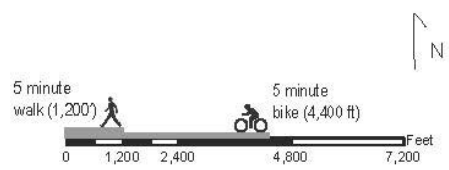


FIGURE 2-1
Transit-Oriented Development Plan Areas

- City Boundary
- M Green Line
- Future Crenshaw/LAX Line
- Aa** Current TOD Plan Areas

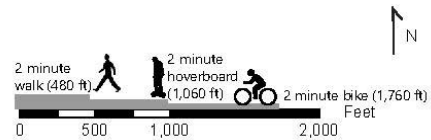


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FIGURE 2-2 Westchester/Veterans TOD Plan Area

-  Inglewood City Boundary
-  Crenshaw/LAX Line
-  Planning Area
-  Downtown Planning Area



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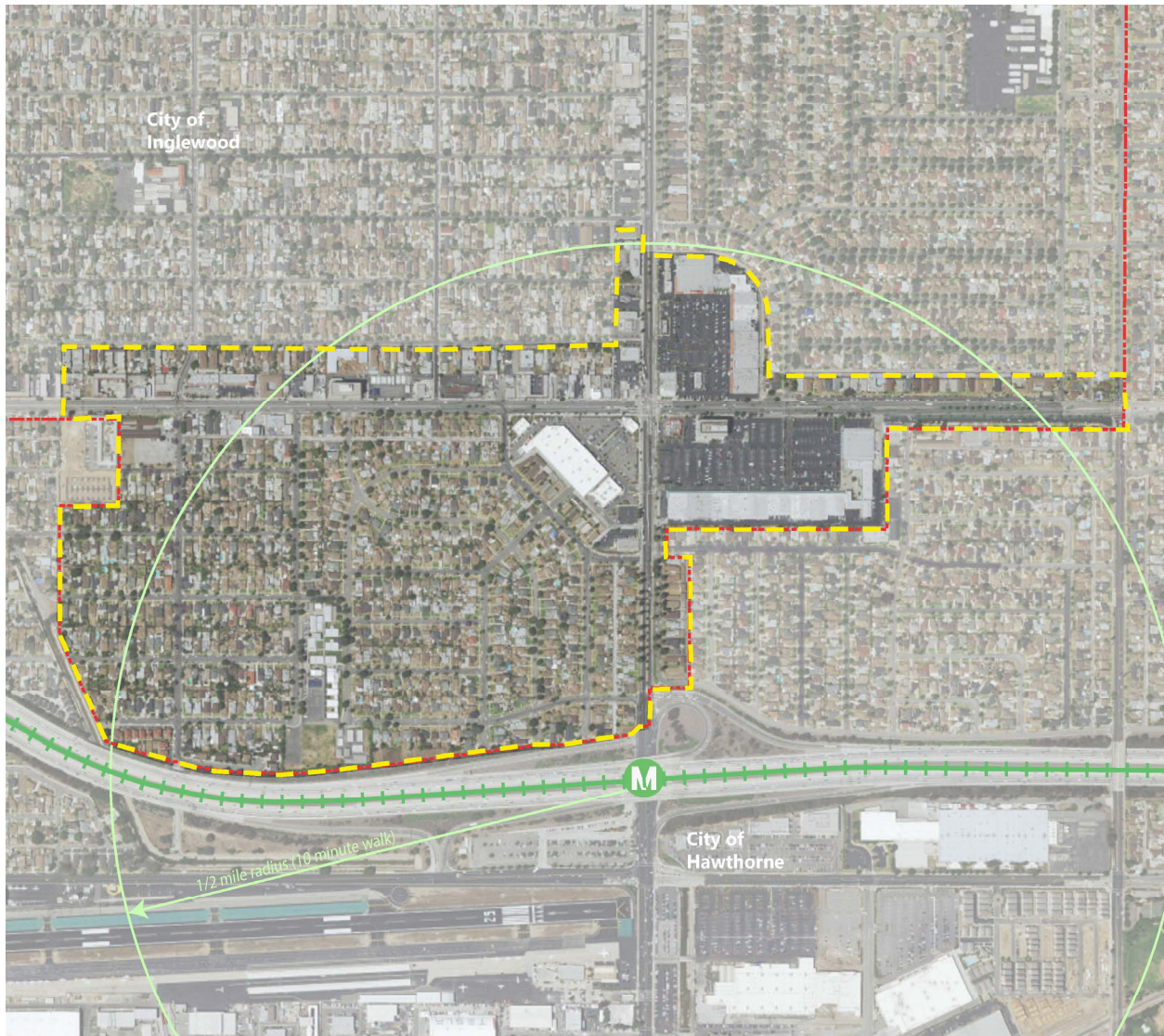
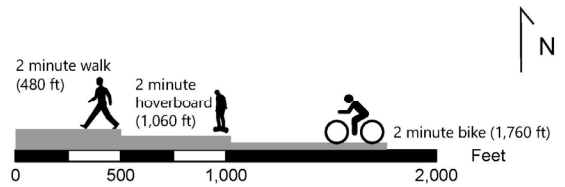


FIGURE 2-3

Crenshaw/Imperial TOD Plan Area

-  Inglewood City Boundary
-  Green Line
-  Planning Area



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include reductions in minimum parking requirements for the uses and locations that are most amenable to transit use. Overall, the TOD plans would provide for the types and amount of development described in **Table 2-1, Proposed Development** and **Table 2-2, Proposed Development Summary**.

TABLE 2-1: PROPOSED DEVELOPMENT

	RESIDENTIAL (units)	RETAIL (s.f.)	COMMERCIAL/ OFFICE (s.f.)	HOTEL (s.f.)	INSTITUTIONAL (s.f.)	INDUSTRIAL (s.f.)
Westchester/Veterans						
Existing Development	1,596	356,215	419,242	80,645	245,161	2,833,385
Future Demolition	37	50,219	61,065	22,694	103,615	253,639
Future Construction	1,143	234,707	1,422,232	34,689	0	0
Development at Buildout	2,702	540,703	1,780,409	92,640	141,546	2,579,746
Crenshaw/Imperial						
Existing Development	1,044	527,735	190,218	49,497	152,809	0
Future Demolition	83	501,773	129,053	17,390	15,216	0
Future Construction	3,067	376,744	45,067	0	0	0
Development at Buildout	4,028	402,706	106,232	32,107	137,593	0
TOD Plans Total						
Existing Development	2,640	883,950	609,460	130,142	397,970	2,833,385
Future Demolition	120	551,992	193,118	40,084	118,831	253,639
Future Construction	4,210	611,451	1,467,299	34,689	0	0
Development at Buildout	6,730	943,409	1,883,641	124,707	279,139	2,579,746

Source: The Arroyo Group, 2021.

2.2 PLANNING OPPORTUNITIES AND NEEDS

Major planning opportunities and needs for the Westchester/Veterans and Crenshaw/Imperial planning areas identified as part of the TOD Plans' planning program include:

- **Citywide Opportunities and Needs**
 - The City's place in the Los Angeles metropolitan region will change substantially as the Metro Crenshaw/LAX rail line and the LAX People Mover increase the area's accessibility and economic potential.
 - The City's role in the region is being enhanced as the result of redevelopment of the former Hollywood Park property and development of new National Football League and National Basketball Association venues just southeast of downtown Inglewood.
 - The City is lacking in open space resources for residents, employees, and visitors.

TABLE 2-2: PROPOSED DEVELOPMENT SUMMARY

	RESIDENTIAL (units)	POPULATION	NON-RESIDENTIAL (s.f.)	JOB
Westchester/Veterans				
Existing Development	1,596	4,617	5,008,003	7,217
Future Demolition/Loss	37	102	465,087	772
Future Construction	1,143	3,155	1,412,676	6,297
Development at Buildout	2,702	7,670	5,955,592	12,742
Net Change	1,106	3,053	947,589	5,525
Crenshaw/Imperial				
Existing Development	1,044	3,281	920,259	3,578
Future Demolition/Loss	83	229	663,432	858
Future Construction	3,067	8,465	421,810	1,017
Development at Buildout	4,028	11,517	678,638	3,737
Net Change	2,984	8,236	-241,621	159
TOD Plans Total				
Existing Development	2,640	7,898	5,928,262	10,795
Future Demolition/Loss	120	331	1,128,519	1,630
Future Construction	4,210	11,620	1,834,486	7,314
Development at Buildout	6,730	19,187	6,634,229	16,479
Net Change	4,090	11,289	705,968	5,684

Source: The Arroyo Group, 2021.

- **Westchester/Veterans**
 - The area needs to become more pedestrian and bicycle friendly. Neither the area's street network nor the orientation of buildings in the area respond to the future transit station and the area remains very automobile oriented.
 - The future consolidation of car rental lots into the proposed consolidated rental car facility for LAX just south of the TOD Plan area may open up significant land area for future development.
- **Crenshaw/Imperial**
 - The TOD Plan area needs to be better connected to Crenshaw Metro Station. Current pedestrian and bicycle connections to the station are unsafe.
 - The large shopping centers on the southwest, southeast, and northeast corners of Crenshaw Boulevard and Imperial Highway have large parking lots and land area that could be used for mixed-use developments, providing the neighborhood with more housing options, more open space, and better-quality commercial tenants.

- Existing strip commercial uses on Imperial Highway need improvement and are a source of concern for the community.

2.3 PROJECT OBJECTIVES

The following identifies the Lead Agency's project objectives, including the underlying purpose of the project, pursuant to State CEQA Guidelines Section 15124(b), which requires an EIR to include a "statement of objectives sought by the proposed project." As noted in CEQA Guidelines Section 15124(b), a "clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings."

2.3.1 OVERARCHING OBJECTIVES OF THE TOD PLANS

The overarching objectives and underlying purpose of the proposed TOD Plans for the Westchester/Veterans and Crenshaw/Imperial areas are to:

- Expand economic development opportunities and enhance revenue-generating activities that support the City's economy and the delivery of public services, and increase opportunities for employment and housing;
- Maximize utilization of the Metro Crenshaw/LAX Line Westchester/Veterans Station and the Metro Green Line Crenshaw Station through the creation of pedestrian-friendly and economically vibrant mixed-use settings and improved non-vehicular access to the stations; and
- Protect and enhance existing residential neighborhoods.

2.3.2 ADDITIONAL OBJECTIVES OF THE TOD PLANS

Additional objectives of the TOD Plans include:

- Providing a model for sustainable development and implementing the Inglewood Energy and Climate Action Plan;
- Developing multi-modal gateways to the City of Inglewood;
- Encouraging art and technology by providing appropriate settings for their development;
- Providing unique open space resources serving both nearby employees and residents of the City;

- Enhancing the Crenshaw/Imperial area as a complete neighborhood hub providing housing, shopping, education, and recreation for residents of all ages and households of all types; and
- Maintaining a safe, well-maintained, unified, and attractive community with a unique sense of place.

2.4 CHARACTERISTICS OF THE TOD PLANS

2.4.1 WESTCHESTER/VETERANS TOD PLAN

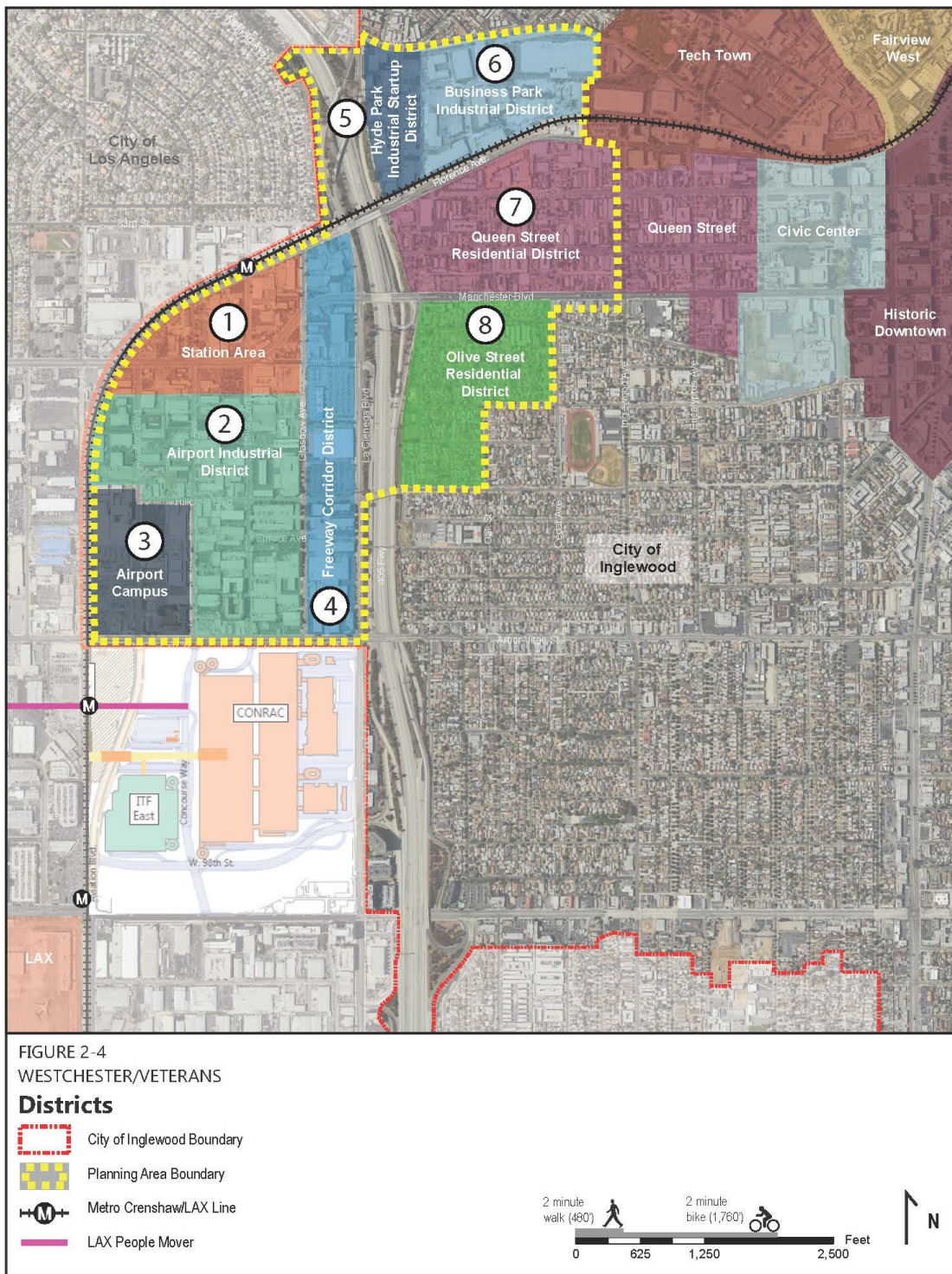
a. Land Use Districts

Figure 2-4 shows the Land Use Districts identified in the Westchester/Veterans TOD Plan. “Districts” identify areas distinguished by a unifying identity or character, even though they may contain a variety of land uses, are. Districts are also used in the TOD Plan to serve as the geographic basis for wayfinding and geographically based programs such as arts districts, Business Improvement Districts and Enhanced Infrastructure Financing Districts. The Westchester/Veterans TOD Plan identifies eight districts, each of which “perform unique and complementary functions within the overall TOD Plan Area.”

Station Area District

The Station Area is the closest district to the Westchester/Veterans Metro station at the intersection of Florence and Hindry Avenues. This district is envisioned as a transit-oriented mixed-use district area focused on the arts. 1019WEST (artist studios), the Knitting Tree, and Three Weavers Brewery, all within the area bounded by Hindry Avenue, Manchester Boulevard, Isis Avenue, and Florence Avenue, form the hub of this arts district, and measures will be taken to encourage the long-term preservation of these uses and addition of new creative and arts uses. A proposed new open space within the right-of-way of Isis Avenue north of Manchester Avenue, flanked by potential retail uses, is proposed to become a focal point for public life.

Higher-density development is encouraged within this District in order to take the most advantage of the transit system. However, the TOD Plan also recognizes that residential development needs to be adequately buffered from industrial uses.



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Airport Campus District

An “Airport Campus” is proposed in the southwestern portion of the TOD Plan area, on the blocks on either side of Aviation Boulevard between Hillcrest Avenue and Arbor Vitae Street, across the street from the future Airport People Mover and Consolidated Rental Car Facility.

This area is less than one mile by car from the closest air freight gates at LAX, which are scheduled to be completed in 2023.

The Airport Campus is proposed to accommodate employment-generating uses, such as office park, creative office campus, corporate training center, secured facility or air cargo distribution center. The proposed TOD Plan also envisions a public garden that could address pollution blowing eastward from the airport into the City.

Airport Industrial District

The Airport Industrial District encompasses an established industrial area located between Manchester Boulevard and Arbor Vitae Street, west of the I-405 freeway. It is mostly composed of light industrial and freight forwarding uses relating to Los Angeles International Airport. The Airport Industrial District provides many jobs for Inglewood residents, and the area’s land use mix is not proposed to change.

Freeway Corridor District

The Freeway Corridor District is distinguished by its frontage on the I-405 freeway. This has led to the location of city-serving, revenue-generating uses such as Home Depot and car dealerships benefitting from both freeway exposure and proximity to LAX. The iconic architecture of Randy’s Donuts is located at the gateway to this area at the I-405 Freeway and Manchester Boulevard. The TOD Plan provides for exploring creation of a local landmark program. Development envisioned for this area includes industrial/flex, office, and hospitality uses.

Hyde Park Industrial Startup District

This district features a number of smaller existing warehouses that are currently attracting some entrepreneurs in the information technology and automotive industries. The TOD Plan retains the existing land use mix of the area and proposes parking and circulation improvements can be made in order to increase the competitiveness of the area for startup businesses.

Business Park Industrial District

The Business Park Industrial District is a well-established, traditional business park which includes the large Marvin Engineering building and other established industrial uses.

Queen Street Residential District

The Queen Street Residential District is a well-established multi-family neighborhood. The Westchester/Veterans TOD Plan rectifies existing industrial/residential land use conflicts along the northern boundary of the district along Florence Avenue and provides for the recycling of older and substandard industrial and commercial uses into neighborhood-serving parkland and additional residential uses.

Olive Street Residential District

The Olive Street Residential District consists primarily of single-family homes, with some townhomes and duplexes.

Manchester Boulevard straddles the Queen Street and Olive Street Residential Districts, and is a mixed-use corridor containing offices, hotels, and retail establishments. The vision for this area, is to introduce residential uses to the mix in order to revitalize the corridor. In addition, the TOD Plan provides development standards that encourage pedestrian-friendly mixed-use development at a moderate scale.

b. Key Development Opportunities

One of the key development potentials identified in the Westchester/Veterans TOD Plan is the 26 acres of rental car facilities (rental facilities and storage areas) located in the TOD Plan area, most of which are located within the Airport Campus District. The intention of the LAX Landside Access Modernization Program is to centralize these rental car facilities and many others in the adjoining areas of the City of Los Angeles into a consolidated rental car facility accessible by people mover from the airport terminals.

If rental car facilities are successfully centralized with sufficient parking space for their vehicle fleets, the rental car facilities in the Westchester/Veterans TOD Plan area will become surplus and available for development. Existing rental car facilities in the Airport Campus District would become a legal non-conforming use under the proposed TOD Plan in order to encourage their recycling to higher-value use.

The Station Area District also has high development potential due to its adjacency to the Westchester/Veterans Metro station. The TOD Plan states that the highest land residuals exist for residential development, and also notes that certain conditions would need to be met in order for residential development to be successful. Open space, neighborhood shopping and the definition of a creative, mixed-use identity for the area are amenities that would support and attract investment in residential, retail, and creative office development.

c. Urban Design Framework

The proposed Urban Design Framework for the Westchester/Veterans TOD Plan is shown in **Figure 2-5**. Its principal elements include:

FIGURE 2-5: WESTCHESTER/VETERANS TOD PLAN URBAN DESIGN FRAMEWORK



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1. A vibrant Westchester/Veterans station area proposed to include an arts cluster centered on existing arts assets, surrounded by a transit-oriented mixed-use area with retail, arts, light industrial, hospitality and residential uses;
2. A transit-oriented, employment-generating Airport Campus on lands currently occupied by car rental facilities near the corner of Aviation Boulevard and Arbor Vitae Street;
3. Extension of the Downtown Green Boulevards network to include Manchester Boulevard;
4. Creation of new open spaces to serve existing and future uses:
 - a. A Plaza on Isis Avenue north of Manchester Boulevard
 - b. Arts Park at the 1019 building
 - c. Triangle Block Park or Olive Avenue Greenway
 - d. Pollution-mitigating Public Garden west of Aviation Boulevard
 - e. Pollution-mitigating and neighborhood-serving Florence Ash Park
5. Pedestrian and bicycle connections across the I-405 freeway, among other active transportation improvements.

d. Complete Streets

The TOD Plan proposes a program of Green Boulevards, Green Connectors, and Neighborhood Connectors (see **Figure 2-5** for locations) and a proposed bicycle network that is summarized in **Figure 2-6**.

Manchester Green Boulevard

The TOD Plan proposes the Manchester Green Boulevard to “serve an important carrier function while also providing environmental benefits and establishing a sense of entry and place to the City and area.” Within the Westchester/Veterans TOD Plan area, Manchester Boulevard is classified as a Major Arterial in the City’s General Plan. As shown in **Figure 2-7**, west of the I-405 freeway, Manchester Boulevard’s two travel lanes in each direction and parking lanes will be restriped, while adding a two-way protected bicycle lane on the north side of the street. This two-way bicycle lane will continue onto a new pedestrian and bicycle bridge (or widening of the existing bridge) over the I-405 freeway on the north side of the street. At Ash Avenue, the eastbound bicycle lane will switch to the south side of the street, and the Green Boulevard will accommodate two one-way protected bicycle lanes, one on each side of the street, to and through Downtown Inglewood.

The Manchester Green Boulevard will retain existing travel lanes. East of the I-405 freeway, approximately 72 parking spaces will be lost. According to the TOD Plan parking study,

utilization of these spaces was typically 38 percent (28 spaces), and all of the businesses and residences along this stretch of Manchester Boulevard possess off-street parking.

Green Connectors

Green Connectors provide the same features as Green Boulevards, but on smaller streets. A representative cross-section is presented in **Figure 2-8**. Hindry Avenue between Florence Avenue and Manchester Boulevard is designated as a Green Connector. This street connects the Manchester Green Boulevard to the Westchester/Veterans Metro station at Florence and Hindry Avenues. It includes one vehicular travel lane and one protected bicycle lane in each direction, separated by a bioswale. A total of 32 parking spaces would be lost in converting Hindry Avenue to a Green Connector. According to the TOD Plan parking study, utilization of these spaces was 28 percent (9 spaces); however, without the Green Connector treatment, this block would likely become used for all-day Metro commuter parking which would not directly benefit adjacent land uses.

Hillcrest Boulevard between La Cienega Boulevard and Aviation Boulevard is also designated as a Green Connector. This street would include walking or biking pathway from the residential neighborhoods east of the I-405 freeway to jobs west of the freeway and to the future Public Garden at the end of Hillcrest Boulevard on Aviation Boulevard. A total of 89 parking spaces, for which utilization was 34 percent (30 spaces) would be lost.

On both of the Green Connector streets, the proposed bioswale would be replaced in certain areas by a painted divider where needed to accommodate truck turning radii onto side streets or into industrial properties.

Neighborhood Connectors

Neighborhood Connectors -- Isis Avenue, Hindry Avenue, Glasgow Avenue, Hyde Park Boulevard and Regent Street -- are identified in the proposed TOD Plan as important streets for linking outlying areas of the TOD Plan area to Green Boulevards, the station area, and Downtown Inglewood. These streets are proposed to prioritize pedestrian and bicycle movement while also accommodating low-speed vehicular movement.

Hindry Avenue south of Manchester Boulevard is classified in the TOD Plan as a Neighborhood Connector with Bike Lane. As shown in **Figure 2-9**, street parking on the east side of the street is proposed to be eliminated in order to accommodate the new bike lane. This would require the loss of 57 parking spaces. Parking utilization on this street was identified in the TOD Plan parking study as 47 percent, providing sufficient parking on the east side of the street to meet the existing parking demand.

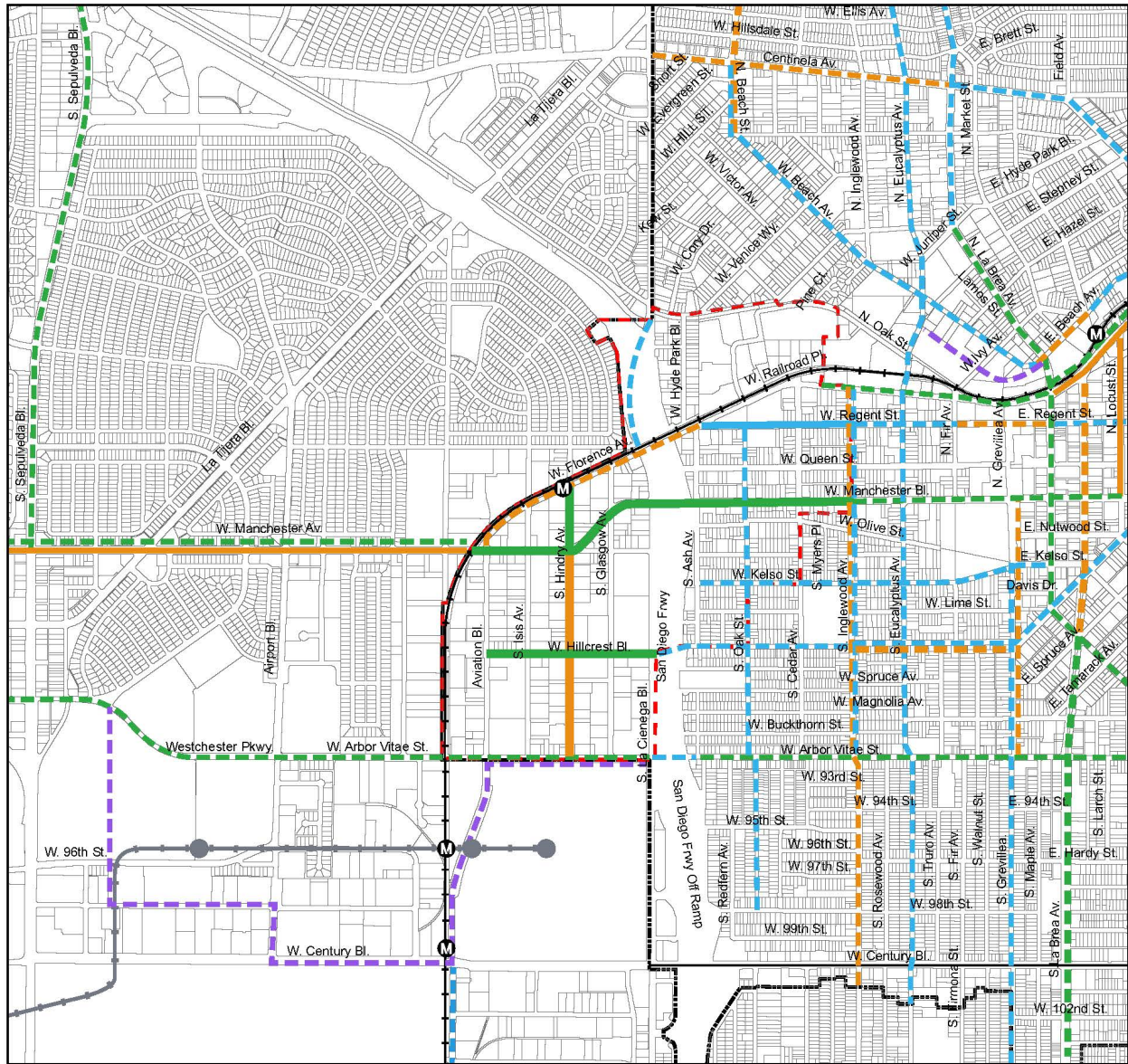


FIGURE 2-6 **Westchester/Veterans TOD Plan Proposed Bicycle Network**

Crenshaw/LAX Line	Class III Bike Route
LAX People Mover	Planned Class III Bike Route
Westchester Station Planning Area	Class II Bike Lane
City of Inglewood Boundary	Planned Class II Bike Lane
Green Boulevard/Protected Class IV Bike Lane	Planned Class I Bike Path
Planned Green Boulevard/Protected Class IV Bike Lane	

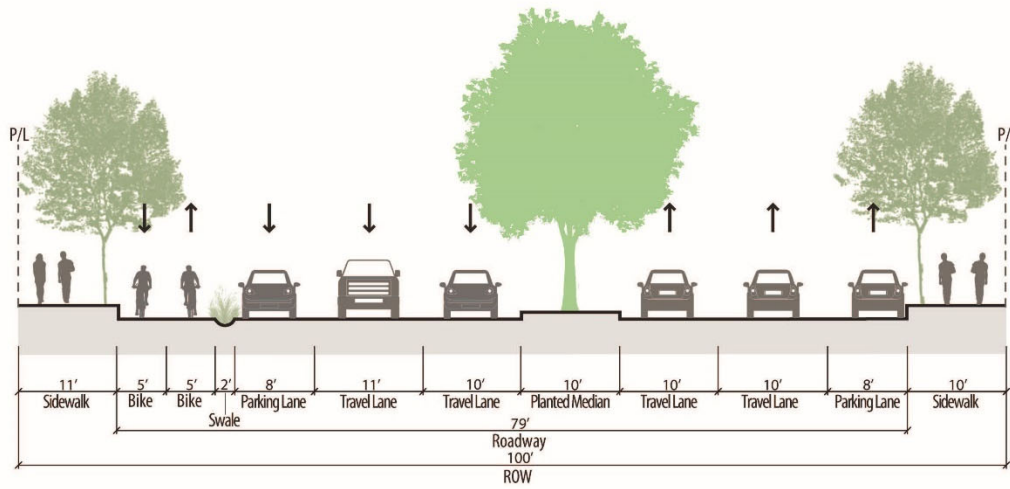
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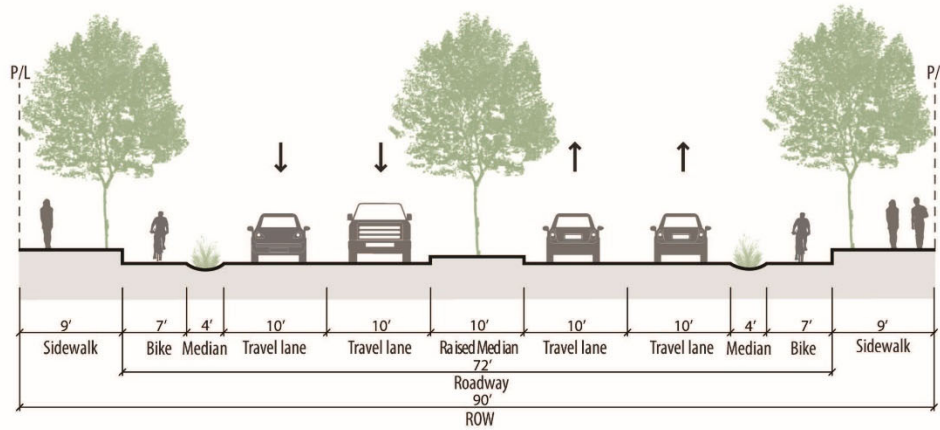
2 minute bike
(1,760)

Sources: Downtown & Fairview Heights TOD Plan, Active Transportation Plan, LA Mobility Plan 2035

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Manchester Boulevard (West of 405 Freeway)

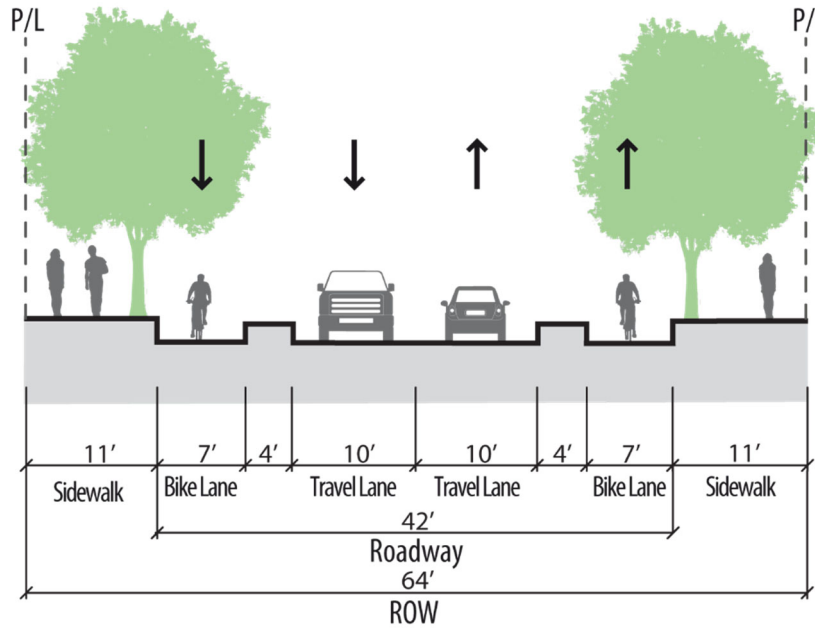


Manchester Boulevard (East of 405 Freeway)

FIGURE 2-7 **Manchester Green Boulevard**

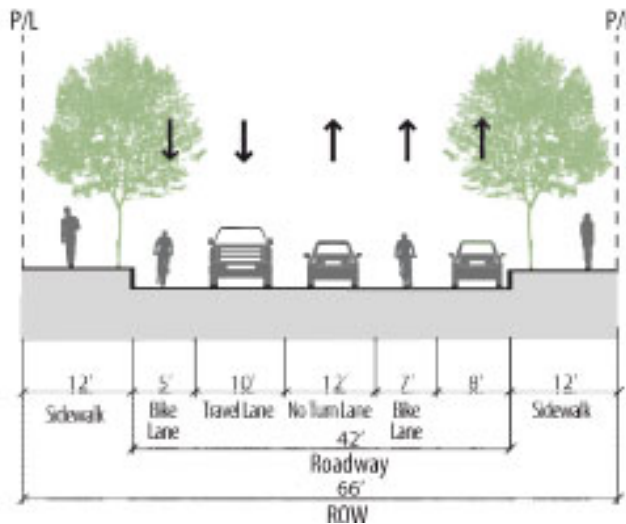
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FIGURE 2-8: GREEN CONNECTOR TYPICAL CROSS-SECTION



Hillcrest Boulevard (W of Interstate 405)

FIGURE 2-9: HINDRY AVENUE (SOUTH OF MANCHESTER BOULEVARD)



Other Neighborhood Connectors do not have specific bicycle facilities, except for Regent Street, which should be designated as a Class III bike route.

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e. Metro Station Access Improvements

Figure 2-5, Urban Design Framework, illustrated proposed “last mile improvements” to enhance access to the Metro Westchester/Veterans Station in addition to the complete streets.

New Station Portal

As noted in the TOD Plan, the original at-grade station design of the Westchester/Veterans Metro Station north of Florence Avenue between Isis Avenue and Hindry Avenue can be accessed only from the east on Hindry Avenue.

The proposed TOD Plan sets forth a rationale for opening a station entrance or portal from the west, at Isis Avenue (see **Figure 2-10**). This proposed entrance would provide a direct link to the Isis Avenue Park, which would become a gateway to the TOD Plan area for transit users. The TOD Plan states that the proposed entrance from the west would provide a shorter walk from the bus stops on Manchester Boulevard for those transferring onto Metro rail system and would also provide access to several City-owned sites in Los Angeles that may have future development potential.

The proposed TOD Plan states that the new station portal should be accompanied by a:

- Pedestrian crossing of the tracks at Isis Avenue;
- High-visibility crosswalk and pedestrian-actuated signal at Florence and Isis Avenues;
- New eastbound bus stop at Manchester Boulevard and Isis Avenue; and
- High-visibility crosswalk painted at Florence and Hindry avenues to serve the east station entrance.

Mid-Block Passthroughs

Mid-block passthroughs are proposed in the TOD Plan to connect streets or alley walkways to each other through the middle of a block and would be pedestrian- and bicycle-only connections. Mid-block passthroughs are proposed to connect Isis Avenue Park, Hindry Avenue and Glasgow Avenue north of Manchester Boulevard. These proposed passthroughs are intended to provide a more direct route for pedestrians to access the Metro station and open space amenities. As noted in the TOD Plan, the route for a pedestrian approaching on Manchester Boulevard from the east to the station entrance at Florence and Hindry Avenues is approximately 1/8 mile shorter through a mid-block passthrough than along Manchester Boulevard to Hindry Avenue.

Mid-block passthroughs are proposed to be no less than 20 feet wide. Access may be restricted during certain nighttime hours as a safety measure.

f. Cross-Freeway Connections

Figure 2-5, Urban Design Framework, indicated five proposed locations for pedestrian and bicycle freeway crossing improvements. Currently, all five locations provide for uncomfortable, unsafe and/or inaccessible pedestrian connections between the east and west sides of the TOD area. The proposed improvement would provide for comfortable, safe pedestrian and bicycle freeway crossings.

Florence Avenue

The proposed TOD includes a conceptual design for a pedestrian and bicycle connection located on the old rail bridge just to the north of Florence Avenue (see **Figure 2-11**). This bridge is located at-grade with the street, immediately below the Metro rail bridge. The proposed TOD Plan notes that approximately 28 parking spaces could also be created in the area occupied by the east landing of the bridge and Augusta Street west of Hyde Park Boulevard to help alleviate the parking shortage in this area.

To connect the bridge and industrial employment areas north of Florence Avenue to the station, the TOD Plan states that sidewalks should also be constructed on the north side of Florence Avenue from Hindry Avenue to La Cienega Boulevard, and from Hyde Park Boulevard to Cedar Avenue.

Manchester Boulevard

The TOD Plan proposes a new north-side pedestrian and bicycle pathway for Manchester Boulevard across the I-405 freeway in one of two ways:

- **Constructing a new bridge.** According to the TOD Plan, a new bridge would be the safest option, as it could fly over the westbound to northbound freeway on-ramp.
- **Widening the existing bridge.** Pending engineering assessments, the proposed TOD Plan also notes that there may be an opportunity to cantilever a widened sidewalk/ bicycle path on the north side of the street. This option would require an at-grade crossing of the westbound to northbound freeway on-ramp. Signage and caution lights will likely also be required.



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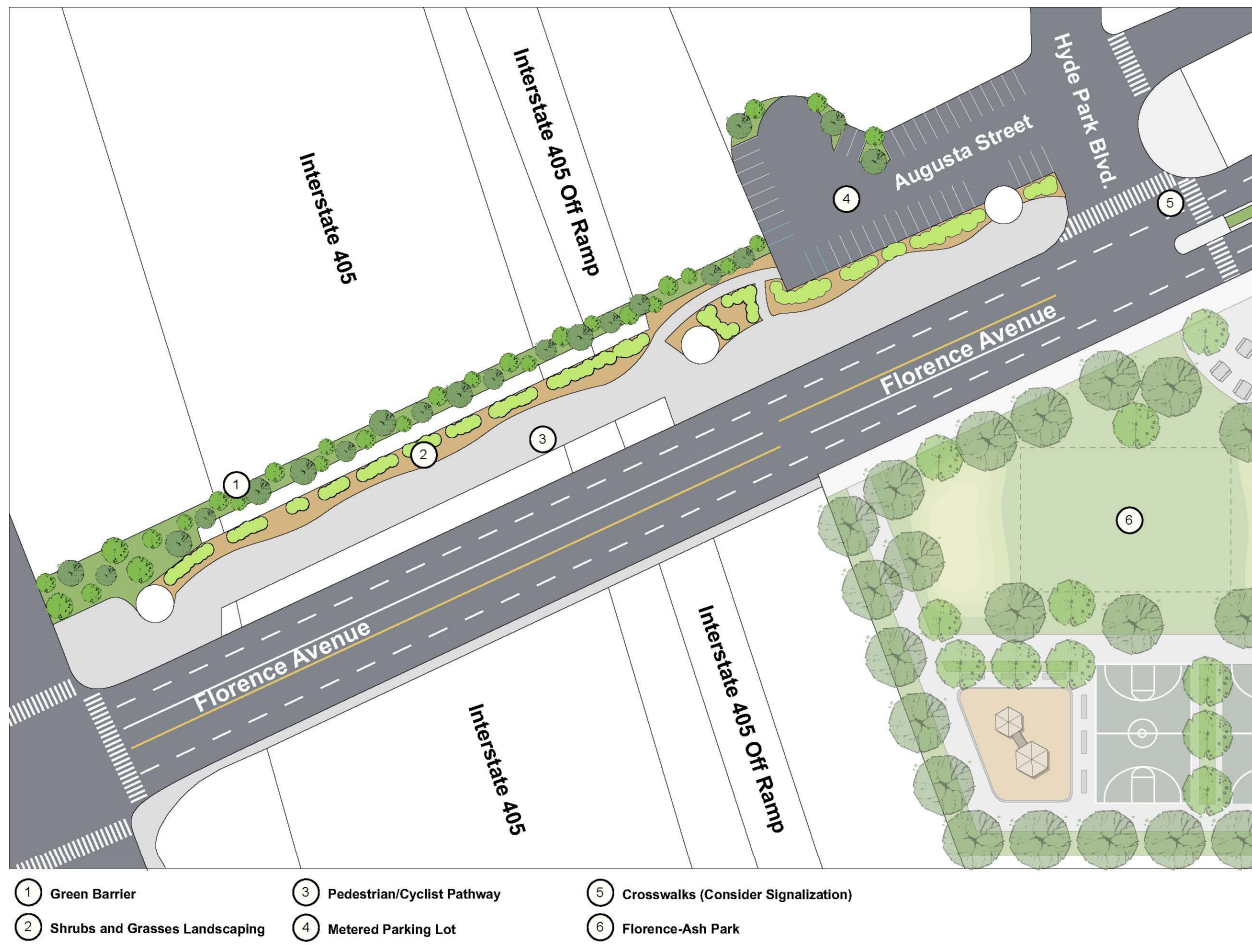


FIGURE 2-11 **Florence Avenue Conceptual Freeway Crossing**

Hillcrest Boulevard

Buffered bicycle lanes are proposed to be painted on the Hillcrest Boulevard bridge to connect to the Green Connector segment west of the freeway.

Oak Street Elementary School Bridge

The proposed TOD Plan suggests that the City should “explore reopening” the existing pedestrian bridge that connects La Cienega Boulevard to Spruce Avenue adjacent to Oak Street Elementary School. This bridge has been closed for a number of years, and graffiti now covers its side.

Arbor Vitae Street

The proposed TOD Plan suggests that the City “may explore” replacing the westbound right-turn lane on the bridge with a bicycle lane to improve this connection, but “does not explicitly endorse this concept.”

g. Open Space Network

The proposed Westchester/Veterans TOD Plan proposes several new public open spaces to address the lack of parks in the City and provide identity and amenities for the area (see **Figure 2-5**, Urban Design Framework).

Isis Avenue Park

The TOD Plan’s proposes converting Isis Avenue right-of-way between Florence Avenue and Manchester Boulevard into a park. The Plan’s concept is for a public plaza area within what is currently the Airport Plaza shopping center. “Isis Avenue Park” is proposed to be an urban gathering space and focal point for the Station Area and Arts Cluster Districts.

1019WEST Arts Park

The proposed TOD Plan envisions that the artist studios at 1019WEST on Manchester Boulevard and Hindry Avenue could enliven the area at this intersection area by converting their existing parking lot into an arts park that is either publicly or privately maintained, providing for artists with their studios at 1019WEST to exhibit their works in the park. Because the building is designed to accommodate parking on the roof, the proposed TOD Plan states that parking would not be lost.

Triangle Block

The proposed TOD Plan envisions the opportunity to create an approximately one-acre open space area within the “Triangle Block” bounded by Manchester Boulevard, Olive Street and Glasgow Avenue in the Station Area District to serve the Station Area, Airport Industrial, and Freeway Corridor Districts.

If property cannot be acquired to build this Triangle Block Park, the TOD Plan proposes a different type of gateway open space be provided by closing the westbound travel lane on Olive Street between Glasgow Avenue and Manchester Boulevard and creating a green pathway with outdoor seating of different types, tree canopy and a gateway monument.

Public Garden

The TOD Plan proposes that a public garden be established on the west side of Aviation Boulevard at Hillcrest Boulevard, or in any part of the Airport Campus if land becomes available for development. The TOD Plan envisions that this public garden would showcase different types of plants and would be a “pleasant place for citizens of Inglewood to spend an afternoon and an attractor for visitors, including LAX passengers.”

Florence Ash Park

Florence Ash Park is proposed to be located on the southwest corner of Florence and Ash Avenues, an area currently occupied by a vacant auto repair shop, substandard residential uses, and an older brick industrial building. The TOD Plan proposes that Florence Ash Park replace these uses with a neighborhood-oriented park buffered from the I-405 freeway with trees. The park would serve the densely populated Queen Street Residential District, which currently has no parks.

While the TOD Plan recommends the creation of each of these open spaces, it does not propose specific mechanisms for the public to acquire privately held land.

f. Proposed Zoning for the Westchester/Veterans TOD Plan Area

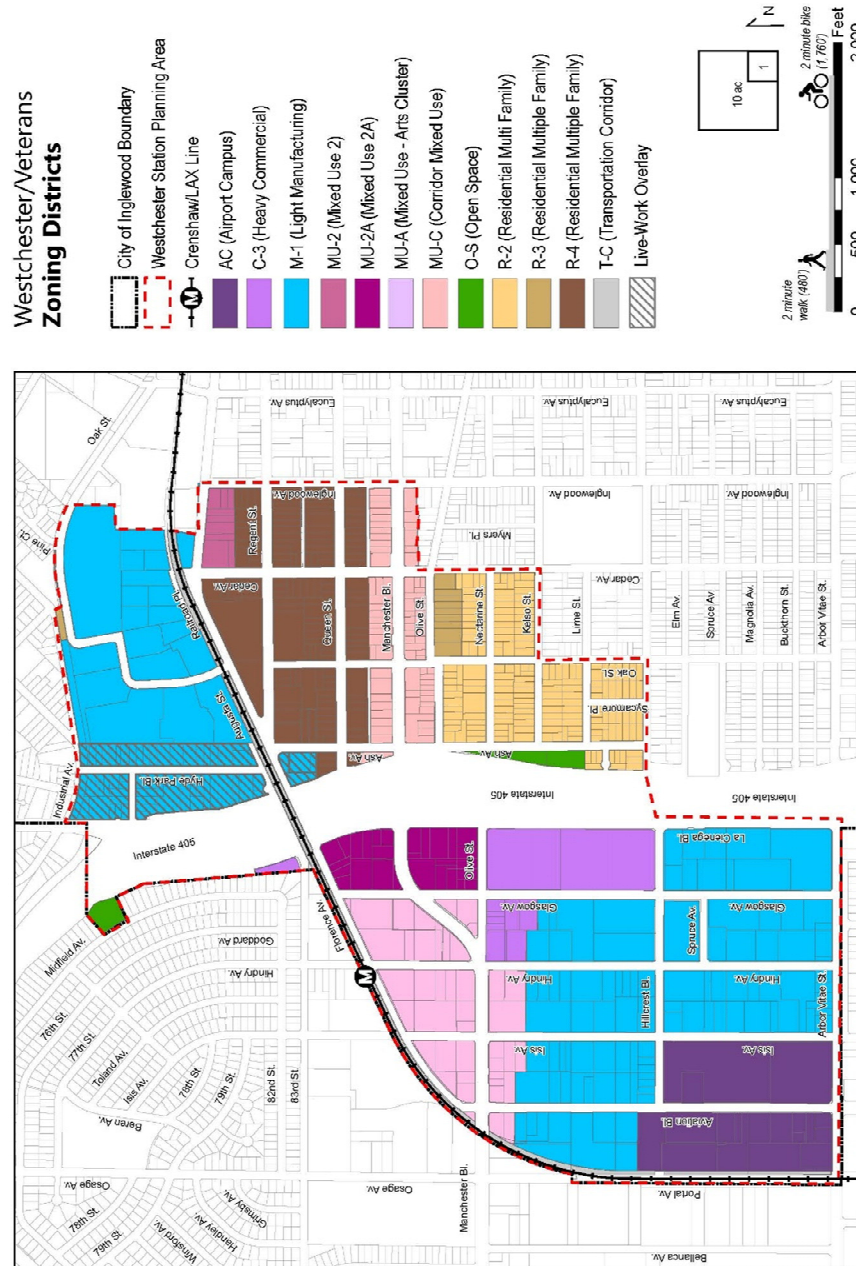
The Westchester/Veterans TOD Plan is proposed to be implemented through adoption of zoning regulations that would govern new development. **Figure 2-12** identifies the proposed zoning map for the Westchester/Veterans area.

Proposed zoning districts for the Westchester/Veterans area include:

- **TOD Mixed Use – Arts Cluster (MU-A)** provides for a mix of uses that foment the growth of a creative, transit-oriented community in the Westchester/Veterans Metro station area. These include art studios, light manufacturing, live/work, lodging, retail, breweries, and multifamily residences.
- **TOD Mixed Use 2 (MU-2)** provides for office, flex, R&D, light industrial and warehousing uses along Florence Avenue. The zoning and development standards mirror the same zone in the recently adopted Downtown Inglewood TOD Plan.
- **TOD Mixed Use 2 (MU-2)** provides for office, flex, R&D, light industrial and warehousing uses along Florence Avenue. The zoning and development standards mirror the same zone in the recently adopted Downtown Inglewood TOD Plan.
- **TOD Mixed Use 2A (MU-2A)** provides for office, flex, R&D, light industrial and warehousing uses in the Freeway Corridor district. The zoning and development standards mirror the TOD Mixed Use 2 zone, but also allows retail and lodging uses.

- **TOD Mixed-Use Corridor (MU-C)** provides for a range of uses that respond to the needs of both a pedestrian-friendly transit-oriented district and the streets with high automobile volumes where this zone is located. The zoning and development standards mirror the same zone in the recently adopted Downtown Inglewood TOD Plan and Design Guidelines.
- **Airport Campus (AC)** provides impetus for the recycling of current rental car facility land into large-scale office, flex, and warehousing/distribution uses proximate to the 96th Street Metro and Automated People Mover station. It also provides for public open space.
- **C-3 Heavy Commercial** is the zoning designation for the Hyundai and Carmax dealerships and Home Depot store on and around La Cienega Boulevard. There are no changes to existing zoning or development standards proposed for this zone.
- **M-1 Light Manufacturing** provides for general commercial uses as well as the fabrication, processing, or treatment of products through processes that are not offensive or obnoxious by reason of emission of odor, dust, smoke, gas, noise, or similar causes. Live-Work Overlay Zone refers to M-1 zoned areas in which live-work units may be constructed.
- **R-4 Residential Multiple Family** provides for higher-density multiple-family residential development in a single-use context. There are no changes proposed to the zoning or development standards for this zone.
- **R-3 Residential Multiple Family** provides for multiple-family residential development in harmony in scale and character with historic single-family uses. There are no changes to the zoning or development standards proposed for this zone.
- **R-2 Residential Limited Multiple Family** provides for two or three dwelling units per lot in the Olive Street Residential District. There are no changes proposed to the zoning or development standards for this zone.
- **O-S Open Space** provides for City-owned parks and plazas. There are no changes to the zoning or development standards proposed for this zone.
- **T-C Transportation Corridor** provides a zoning designation for the Metro Crenshaw/LAX Line right-of-way.

FIGURE 2-12: WESTCHESTER/VETERANS TOD PLAN PROPOSED ZONING DISTRICTS



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2.4.2 CRENSHAW/IMPERIAL TOD PLAN AREA

a. Land Use Districts

Figure 2-13 shows the Land Use Districts identified in the Crenshaw/Imperial TOD Plan. “Districts” identify areas distinguished by a unifying identity or character, even though they may contain a variety of land uses, are. Districts are also used in the TOD Plan to serve as the geographic basis for wayfinding and geographically based programs such as arts districts, Business Improvement Districts and Enhanced Infrastructure Financing Districts. The Crenshaw/Imperial TOD Plan identifies five districts.

Gateway Center District

The Gateway Center District is comprised of mixed uses, combining retail and residential, around all four quadrants of the Crenshaw/Imperial intersection. This District serves as a shopping, open space and public facilities resource for the surrounding neighborhoods which are primarily in the City of Inglewood. The proposed TOD Plan provides for intensification of existing commercial land uses, along with the addition of residential uses in a mixed-use setting.

South Gateway Corridor District

The South Gateway Corridor District comprises medium density residential uses within walking and bicycling distance of both the Metro Green Line Station located in the I-105 Freeway median to the south and the retail uses of the Gateway District located to the north. It also serves as the Southern Gateway to the City of Inglewood. The proposed TOD Plan provides for some intensification of existing residential uses.

East Gateway Corridor District

The East Gateway Corridor District is comprised of lower to medium density residential uses that help support the retail uses of the Gateway Center District. This District provides a secondary City Gateway at the eastern boundary of Inglewood as well as a Gateway to the Gateway Center District. The TOD Plan does not propose any intensification to this corridor.

West Gateway Corridor District

The West Gateway Corridor District is a mixed-use corridor comprised of retail, residential, education and office uses. Like the Gateway Center District, it provides retail and service uses to the adjacent neighborhoods to the north and south as well as to the residential uses in the corridor. The TOD Plan provides for intensification of development along Imperial Highway,

with the potential for commercial uses to extend northerly to 113th Street, as well as the potential for multi-family residential uses to front Imperial Highway.

South West Neighborhood District

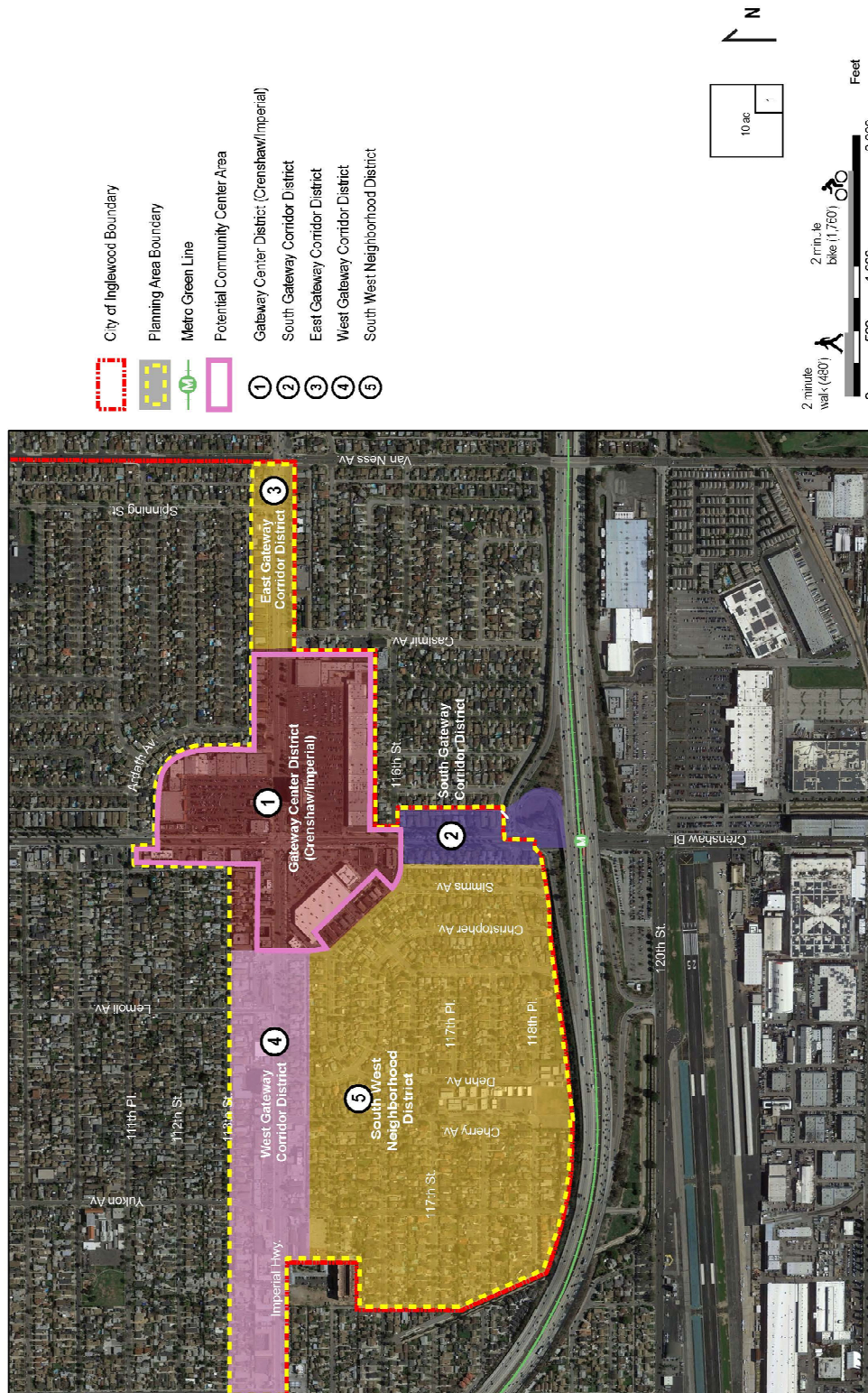
The South West Neighborhood District is a single-family neighborhood that both supports and is served by the retail and open space uses of the Gateway Center to the northeast and the Green Line Metro Station to the southeast. The TOD Plan proposes to protect the existing character of this neighborhood, and to enhance access to nearby commercial uses and the Crenshaw Metro Station.

b. Urban Design Framework

The proposed Urban Design Framework for the Crenshaw/Imperial TOD Plan is shown in **Figure 2-14**. Its principal components include:

1. A **City Gateway/District Center Focal Plaza** is proposed to create both a grand entry space to the City of Inglewood and entry plazas to the development around all four corners of the Crenshaw/Imperial intersection. The Gateway Focal Plazas within each quadrant of the intersection are proposed to be of sufficient size to accommodate areas for outdoor dining, sitting and small events that can be buffered from the street edge traffic by both distance and design elements such as low walls and landscaping.
2. **Public/Private Open Spaces** are proposed as amenities for the mixed retail and residential uses at each corner, and also as recreation space for the surrounding neighborhoods.
3. A **Ring Open Space** consists of three separate open space areas and is proposed to buffer single family neighborhoods from higher density mixed uses. The Ring Open Space also provides over a mile of walking and bicycling paths for both the residents of new, mixed-use developments and the residents of adjacent single-family neighborhoods.
4. Proposed **Open Space Connectors** are intended to provide pathways between Gateway Focal Plazas, the Public-Private Open Spaces, the Ring Open Spaces and to the sidewalks fronting Crenshaw Boulevard and Imperial Highway. These Open Space Connectors are intended to provide functional access for shoppers to reach retail spaces by foot and enable the Gateway District to function as a “park once” district, thus reducing trip making. The proposed Open Space Connectors are also intended to provide access to the open space amenities for residents both within the Gateway Center and the surrounding neighborhoods. The proposed Open Space Connectors also provide direct pedestrian connections to the signalized mid-block crossings on Crenshaw Boulevard and Imperial Highway.

FIGURE 2-13: CRENSHAW/IMPERIAL TOD PLAN URBAN DESIGN DISTRICTS



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FIGURE 2-14: CRENSHAW/IMPERIAL TOD PLAN URBAN DESIGN FRAMEWORK



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The open space areas in the Urban Design Framework items 1-4 are proposed to be primarily constructed and maintained by the private sector; however, the TOD Plan includes a requirement for public access during appropriate daytime hours.

5. The **Crenshaw Green Boulevard** is proposed to provide a pedestrian/bicycle connection from the Metro station to the south and to the residential and retail uses of the Gateway Center District. As illustrated in **Figure 2-15**, the Crenshaw Boulevard cross section maintains all travel lanes and the existing Pine trees, as well as the planted medians and parkways. Bicycles are proposed to be accommodated within shared lanes within the existing frontage road to the south of 116th Street and on a separate “cycle track” to the north of 116th Street.
6. A linear **Gateway Park** is proposed to be created on Crenshaw Boulevard at the northbound onramp to the I-105 freeway by realigning the existing free right turn to align with the westbound freeway off-ramp at the existing signalized intersection. This realignment would enhance pedestrian access to the Metro Green Line station by providing pedestrian (see **Figure 2-16**).
7. **City and District Center Gateways.** Appropriate signage announcing entry into the District Center from the north, east, south, and west are recommended by the TOD Plan.
8. **Traffic Signals/Pedestrian Crossings.** The integration of existing and new pedestrian crossings with existing and new traffic signals is proposed to allow for safe passage of both pedestrians and cyclists across Crenshaw Boulevard and Imperial Highway, and to provide for the efficient access of automobiles into the mixed-use projects proposed for the Crenshaw/Imperial TOD Plan area.

c. **Proposed Zoning for the Crenshaw/Imperial TOD Plan Area**

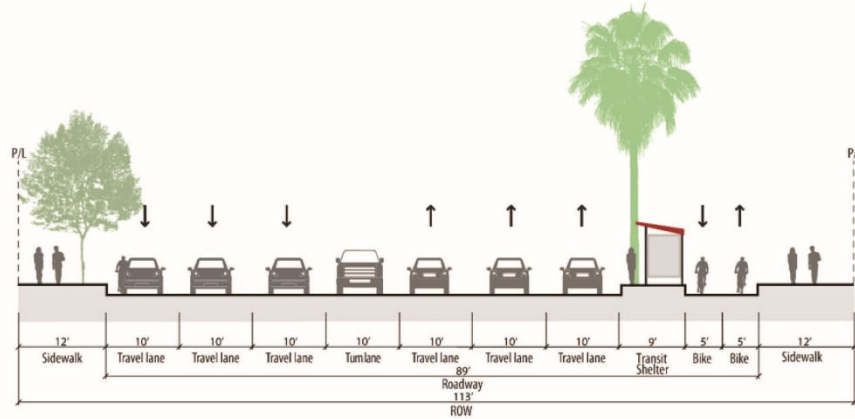
The Crenshaw/Imperial TOD Plan is proposed to be implemented through adoption of zoning regulations that would govern new development. **Figure 2-17** identifies the proposed zoning map for the Crenshaw/Imperial TOD Plan.

Proposed zoning districts for the Crenshaw/Imperial TOD Plan area include:

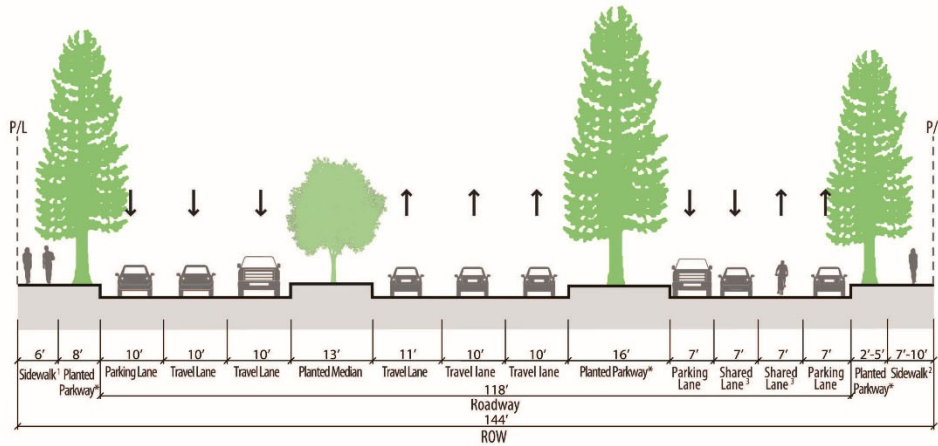
- **C-2 General Commercial** provides for general commercial uses as in the rest of the City. There are no changes to the zoning and development standards for this zone in the proposed TOD plan.
- **Mixed Use 1A Overlay (MU-1A)** is an optional overlay zone that provides for residential/retail mixed-use development suitable for the Gateway Center District.
- **TOD Mixed-Use Corridor (MU-C)** provides for a range of uses intended to respond to the needs of both a pedestrian-friendly transit-oriented district along the streets with high automobile volumes where this zone is located. The zoning and development

standards mirror the same zone in the recently adopted Downtown and Fairview Heights TOD Plan.

- **R-4 Residential Multiple Family** provides for higher-density multiple-family residential development in a single-use context. There are no changes proposed to the zoning or development standards for this zone in the TOD Plan.
 - **R-3 Residential Multiple Family** provides for multiple-family residential development in harmony in scale and character with historic single-family uses. There are no changes proposed to the zoning or development standards for this zone in the TOD Plan.
 - **R-2 Residential Limited Multiple Family** provides for two dwelling units per lot. There are no changes proposed to the zoning or development standards for this zone in the TOD Plan.
 - **R-1 Residential Single Family** provides for one dwelling unit per lot. There are no changes proposed to the zoning or development standards for this zone in the TOD Plan.
 - **O-S Open Space** provides for City-owned parks and plazas. There are no changes proposed to the zoning or development standards for this zone in the TOD Plan.
-



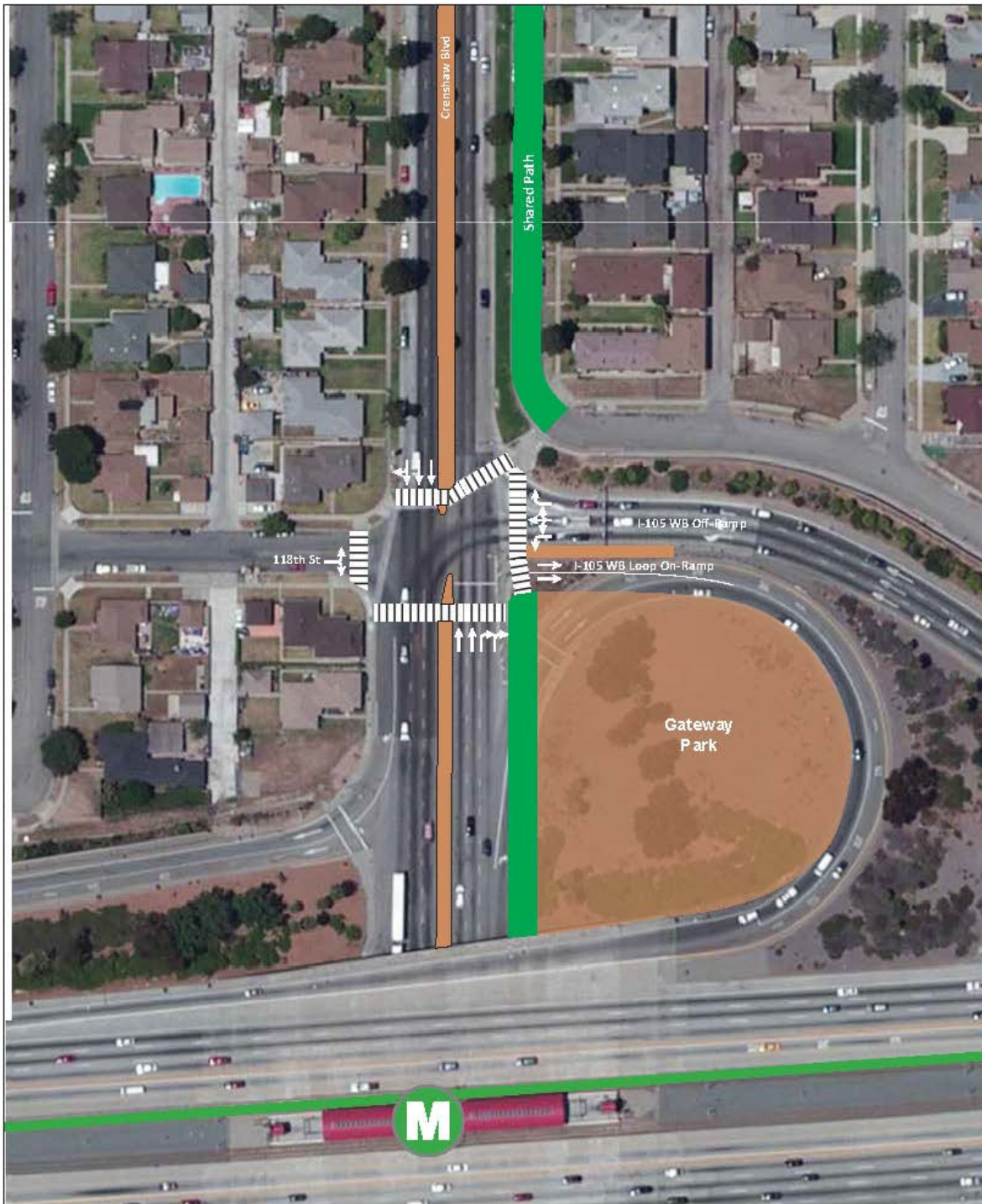
Crenshaw Boulevard (North of 116th Street)



Crenshaw Boulevard (South of 116th Street)

FIGURE 2-15 **Crenshaw Green Boulevard**

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iteris City of Inglewood Transit Oriented District (TOD)
Westchester/Veterans and Crenshaw/Imperial

Figure 2-16
Gateway Park

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2.5 ANTICIPATED DISCRETIONARY APPROVALS AND ACTIONS

The list below identifies the discretionary approvals that are anticipated and therefore analyzed at a programmatic level in this Draft Program EIR.

2.5.1 CURRENT PROPOSED ACTIONS BY THE CITY OF INGLEWOOD

The following actions are currently being considered by the City of Inglewood:

- Approval of Transit Oriented Development Plans for the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas, each of which includes a Concept Plan, Transit Oriented Development zoning, and Design Guidelines.
- Approval of a General Plan Amendment for the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas.

2.5.2 POTENTIAL FUTURE ACTIONS BY THE CITY OF INGLEWOOD

The following actions may be considered by the City of Inglewood to implement the proposed TOD Plans:

- Approval of future site-specific development projects within the Westchester/Veterans and Crenshaw/Imperial areas consistent with the provisions of the applicable Transit Oriented Development Plan.
- Close Isis Avenue north of Manchester Boulevard for open space.
- Eliminate westbound travel and parking lane on Olive Avenue between Manchester Boulevard and Glasgow Avenue for open space.
- Establish property-based Business Improvement Districts for the Westchester/Veterans and Crenshaw/Imperial areas.
- Capital improvement projects within the Westchester/Veterans area (see **Figure 2-18**).
- Capital improvement projects within the Crenshaw/Imperial area (see **Figure 2-19**).
- Establish Enhanced Infrastructure Financing Districts for the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas.
- Approval of an inclusionary zoning policy to require affordable housing within new residential developments.
- Construct City Gateway Park on the east side of Crenshaw Boulevard south of 118th Street in coordination with the City of Hawthorne.

2.5.3 POTENTIAL FUTURE ACTIONS BY OTHERS

As the result of the proposed TOD Plans, the following actions may be considered in the future by agencies other than the City of Inglewood:

- Crenshaw Boulevard/I-105 Freeway On-Ramp Redesign (Caltrans, City of Hawthorne)
- New portal to the Westchester/Veterans Metro Station (Los Angeles Metro)

2.6 REFERENCES – PROJECT DESCRIPTION

The Arroyo Group, *Westchester/Veterans Station Area Transit-Oriented Development Plan and Design Guidelines, Public Review Draft*, November 2021.

The Arroyo Group, *Crenshaw/Imperial Station Area Transit-Oriented Development Plan and Design Guidelines, Public Review Draft*, November 2021.

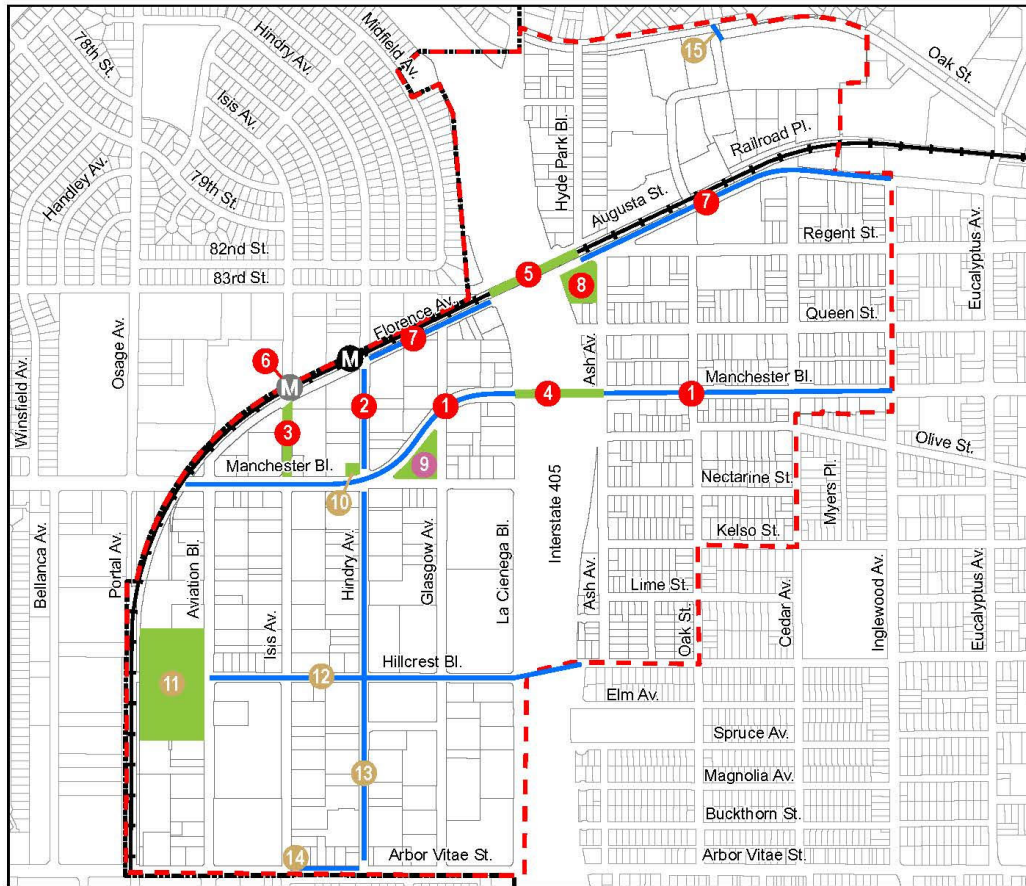


FIGURE 2-18

Westchester/Veterans Capital Improvement Projects

- City of Inglewood Boundary
- Westchester Station Planning Area

Higher Priority Projects

- 1** Manchester Blvd. Green Boulevard
- 2** Hindry Ave. Green Connector
- 3** Isis Ave. Park
- 4** Manchester Blvd. Bridge Widening
- 5** Old Rail Bridge Pedestrian Redesign
- 6** New Metro Station Portal
- 7** Florence Ave. Sidewalk
- 8** North Ash Park

Medium Priority Projects

- 9** Triangular Block Park OR Extended Olive St. Sidewalk

Lower Priority Projects

- 10** 1019 Building Arts Park
- 11** Public Botanical Garden
- 12** Hillcrest Blvd. Green Connector
- 13** Hindry Ave. Bike Lane
- 14** Arbor Vitae St. Sidewalk
- 15** Hyde Park Blvd./Oak St. Connector

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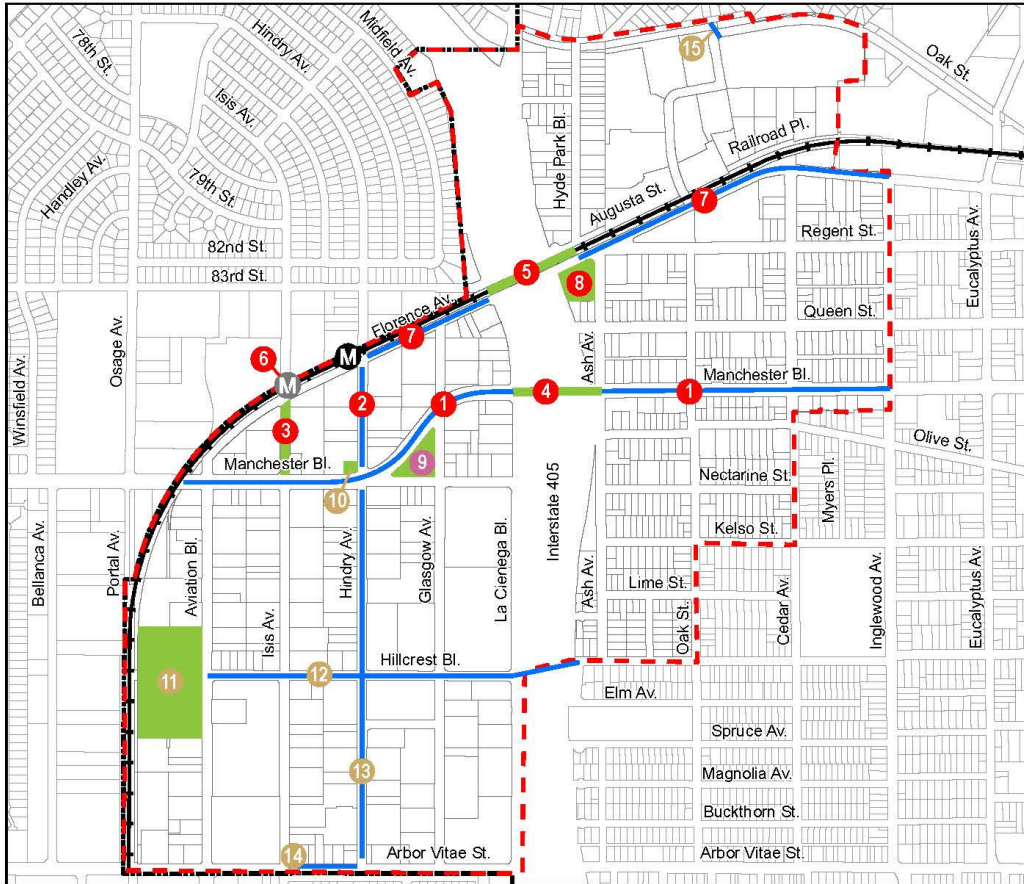
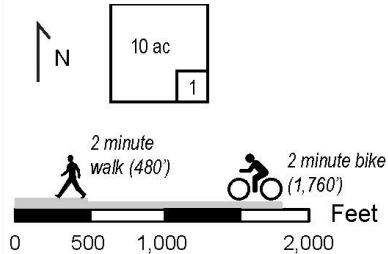


FIGURE 2-18

Westchester/Veterans Capital Improvement Projects

City of Inglewood Boundary
 Westchester Station Planning Area



Higher Priority Projects

- 1 Manchester Blvd. Green Boulevard
- 2 Hindry Ave. Green Connector
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- 4 Manchester Blvd. Bridge Widening
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Lower Priority Projects

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- 11 Public Botanical Garden
- 12 Hillcrest Blvd. Green Connector
- 13 Hindry Ave. Bike Lane
- 14 Arbor Vitae St. Sidewalk
- 15 Hyde Park Blvd./Oak St. Connector

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3.1 INTRODUCTION

This chapter focuses upon evaluating the significant environmental effects of proposed Westchester/Veterans and Crenshaw/Imperial Transit Oriented Development (TOD) Plans, which are described in Chapter 2, *Project Description*. This Chapter describes the existing physical environmental setting (also referred to as “baseline”) for each environmental topic, and the impacts that would result from the proposed Westchester/Veterans and Crenshaw/Imperial Transit Oriented Development Plans. Because existing federal, state, and local regulations also will (1) shape how site-specific development projects and infrastructure improvements permitted by these TOD Plans are implemented and (2) provide requirements for avoiding and reducing environmental impacts, a discussion of relevant plans, programs, and policies pertinent to each environmental issue addressed in this Chapter is provided. Finally, this chapter identifies feasible mitigation measures to reduce the significant impacts of proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans.

3.1.1 ENVIRONMENTAL ISSUES ADDRESSED IN THIS EIR

The following sections in this chapter analyze the environmental topics listed below:

- | | |
|--|---|
| 3.2 Effects Found not to be Significant | 3.10 Noise and Vibration |
| 3.3 Land Use and Planning Policy | 3.11 Hazards and Hazardous Materials |
| 3.4 Population and Housing | 3.12 Hydrology and Water Quality |
| 3.5 Cultural and Tribal Cultural Resources | 3.13 Geology, Soils, and Seismicity |
| 3.6 Transportation | 3.14 Public Services |
| 3.7 Air Quality | 3.15 Utilities, Service Systems, and Water Supply |
| 3.8 Greenhouse Gas Emissions | 3.16 Recreational Resources |
| 3.9 Energy Resources | |

3.1.2 FORMAT OF ENVIRONMENTAL ANALYSIS SECTIONS

Each environmental analysis section in this Chapter generally includes the following main subsections:

- *Introduction*, outlining what the section will address and providing definitions of technical terms used in the section.
- *Applicable Plans, Policies, and Regulations*, describing federal, state, and local plans, policies, and regulations that implementation of proposed TOD plans for the Westchester/Veterans and Crenshaw/Imperial TOD must address and would thus shape its implementation.
- *Environmental Setting*, describing the existing physical environmental conditions (environmental baseline) related to the environmental topic being analyzed.
- *Significance Criteria*, setting forth the thresholds of significance (significance criteria) used to determine whether impacts are “significant.”
- *Impacts and Mitigation Measures*, setting forth and analyzing one or more impact statements for each identified significance threshold. The analysis of each impact statement is organized as follows:
 - A statement of the impact being analyzed, along with the EIR’s conclusion about the significance of the impact.
 - A description of the methodology used to analyze the impact and determine whether it would be significant or less than significant.
 - An impact assessment that evaluates the changes to the physical environment that would result from the proposed TOD Plans.
 - A significance conclusion comparing identified impacts of the proposed TOD Plans to the relevant significance threshold and presenting a determination on the significance of each impact prior to the implementation of any required mitigation.
 - All feasible mitigation measure(s) for each impact determined to be significant. Mitigation measures include enforceable actions to:
 - avoid a significant impact;
 - minimize the severity of a significant impact;
 - rectify an impact by repairing, rehabilitating, or restoring the affected physical environment;
 - reduce or eliminate the impact over time through preservation and/or maintenance operations during the life of the TOD Plans; and/or
 - compensate for the impact by replacing or providing substitute resources or environmental conditions.

- Actions to be taken to ensure effective implementation of required mitigation measures.
- Analysis of the effectiveness of identified mitigation measure(s) to avoid or reduce significant impacts to a less-than-significant level.
- *References*, listing the background information used to prepare the analysis in the section.

This EIR identifies all thresholds, impacts, and mitigation measures with an alpha-numeric designation for thresholds of significance, impacts, and mitigation measures as discussed below.

- Significance thresholds are provided with numbers related to the section in which they are found. For example, air quality significance thresholds in Section 3.8, *Air Quality*, are numbered **Threshold AQ-1** through **Threshold AQ-5**.
- Impacts are numbered based on the environmental threshold they address. For example, **Impact AQ-1** provides analysis in relation to **Threshold AQ-1**.
- Where more than one impact is analyzed in relation to a specific threshold, each impact is provided with a unique number. For example, the four impacts analyzed in relation to **Threshold PSF-1** (police protection, fire protection, school, and libraries) are numbered **Impact PSF-1.1**, **PSF-1.2**, **PSF 1.3**, and **PSF-1.4**, respectively.
- Similarly, each mitigation measure is numbered to correspond to the impact and threshold that it addresses. For example, **Mitigation Measure AQ-2a** and **Mitigation Measure AQ-2b** address air quality **Impact AQ-2**, which analyzes **Threshold AQ-2**.

a. Environmental Setting/Baseline

“Environmental Setting” subsections describe current conditions with regard to the environmental resource area reviewed. CEQA Guidelines Section 15125 states that “An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, from both a local and regional perspective. The environmental setting will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to gain an understanding of the significant effects of the proposed project and its alternatives.”

CEQA Guidelines and case law recognize that the date for establishing an environmental baseline is not rigid (see CEQA Guidelines Sections 15146, 15151, and 15204). In some instances, information is presented in the environmental setting that differs from the precise time of the Notice of Preparation (NOP). This information is considered representative of baseline

conditions. Furthermore, environmental conditions may vary from year to year, and in some cases, it is necessary to consider conditions over a range of time periods.

The NOP for this EIR was published in November 2017. Except as specified otherwise within the document, any reference to “existing” conditions throughout this EIR refers to the baseline condition as of November 2017. Where technical studies or other baseline information refer to a different date, an explanation of the validity of that baseline information in relation to November 2017 baseline conditions is provided.

b. Thresholds of Significance/Significance Criteria

CEQA Guidelines Section 15382 defines a significant effect on the environment as *“a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.”*

The “Significance Criteria” subsections provide the specific thresholds of significance by which impacts are judged to be significant or less than significant in this EIR. These include identifiable quantitative or qualitative standards or sets of criteria pursuant to which the significance of each given environmental effect can be determined. Exceedance of a threshold of significance normally means the effect will be determined to be “significant” (CEQA Guidelines Section 15064.7(a)). However, an iron-clad definition of a “significant” effect is not always possible because the significance of an activity may vary with the setting (CEQA Guidelines Section 15064(b)). Therefore, a Lead Agency has the discretion to determine whether to classify an impact described in an EIR as “significant,” depending on the nature of the area affected. The thresholds of significance used to assess the significant of impacts are based on those provided in Appendix G of the CEQA Guidelines.

c. Impact Significance Classifications

The following classifications are used throughout the impact analysis in this EIR to describe the level of significance of environmental impacts:

- **Classification of Impacts Prior to Implementation of Mitigation**
 - **Significant Impact** - A significant impact is defined by Section 15382 of the CEQA Guidelines as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself “shall not be

considered a significant effect on the environment ... [but] may be considered in determining whether the physical change is significant." As defined in this EIR, a significant impact exceeds the defined significance criteria and therefore requires mitigation.

- **Less-than-Significant Impact** – The impact does not reach or exceed the defined threshold (criterion) of significance. Therefore, no mitigation is required.
- **No Impact** – No adverse effect on the environment would occur, and mitigation measures are not required.
- **Classification of Significant Impacts with Implementation of Mitigation**
 - **Significant but Mitigable Impact** – Feasible mitigation measures will, when implemented, reduce the significant impact to a less-than-significant level.
 - **Significant Unavoidable Impact** – Even with implementation of all feasible mitigation measures, the significant impact cannot be reduced to a less-than-significant level.

While CEQA requires that an EIR identify all feasible mitigation to avoid or reduce the significant impacts of a project, it also permits public agencies to approve a project even though it would result in one or more significant unavoidable environmental effects. For a Lead Agency to approve project with one or more significant unavoidable impacts, it must first prepare a statement of overriding considerations, which identifies the specific economic, legal, social, technological, or other benefits of the project, including region-wide or state-wide environmental benefits, that outweigh its significant unavoidable effects and thereby warrant its approval (Public Resources Code Section 21083; CEQA Guidelines Section 15093). The statement of overriding considerations must be supported by substantial evidence in the record (CEQA Guidelines Section 15093(a)).

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3.2 EFFECTS FOUND NOT TO BE SIGNIFICANT

Under the California Environmental Quality Act (CEQA), EIRs are intended to focus their discussion on significant impacts and may limit discussion of other impacts to a brief explanation of why the impacts are not significant.

The following discussion describes the analysis leading to the conclusions that environmental effects of the proposed TOD Plans would not be significant in relation to aesthetics and visual resources, agricultural and forestry resources, biological resources, mineral resources, wildfire, or vehicle miles travelled and therefore did not require detailed analysis.

3.2.1 AESTHETICS AND VISUAL RESOURCES

Public Resources Code §21099(d)(1) states, “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Since both TOD plans exclusively propose residential, mixed-use residential, and employment-generating uses on infill sites that are within one-half mile of an existing major transit stop (Metro light rail), aesthetic impacts are not considered significant under CEQA.

3.2.2 AGRICULTURAL AND FORESTRY RESOURCES

The Westchester/Veterans and Crenshaw/Imperial TOD Plan areas are within a fully urban setting, have long been developed, and do not provide any opportunity for agricultural or forestry use. The Westchester/Veterans and Crenshaw/Imperial areas do not contain any lands planned, zoned, used, or suitable for commercial agriculture; do not contain any state-designated farmland; and do not contain or abut any forest resources. Therefore, the TOD Plans for the Westchester/Veterans and Crenshaw/Imperial areas would have no impact on agricultural or forestry resources.

3.2.3 BIOLOGICAL RESOURCES

The Westchester/Veterans and Crenshaw/Imperial TOD Plan areas are located in an urban setting that has long been developed and does not support sensitive biological resources. The City of Inglewood General Plan Background Report (2006) acknowledges that sensitive biological resources would not occur, unless sensitive biological habitats are created in the future.

The Westchester/Veterans and Crenshaw/Imperial areas do not support sensitive biological resources and do not include lands identified in conservation or regional habitat conservation plans. There are no sensitive habitats such as wetlands, waters, marshes, or riparian areas

present. The California Natural Diversity Database does not identify any recently recorded observations of sensitive plant or animal species or sensitive habitats protected under state or federal endangered species acts (CNDDDB, 2016). The last known occurrence of a sensitive species in Inglewood is dated 1906, long before the area was developed for urban uses, and the database indicates the species identified at that time is now considered “extirpated,” meaning it no longer occurs in Inglewood. No habitat creation is proposed as part of the Westchester/Veterans and Crenshaw/Imperial TOD Plans. Therefore, the Westchester/Veterans and Crenshaw/Imperial TOD Plans would not impact any sensitive biological resources and further analysis is not required.

3.2.4 MINERAL RESOURCES

According to the City of Inglewood General Plan Update (2006), oil is the only extractable resource known to exist within the City, with the possible associated presence of natural gas. The Westchester/Veterans and Crenshaw/Imperial TOD Plan areas have been fully developed with urban uses for several decades and contain no known existing mineral resources. The California Geological Survey has classified lands within Los Angeles County into Mineral Resource Zones (MRZs) based on guidelines adopted by the California State Mining and Geology Board, as mandated by the Surface Mining and Reclamation Act of 1974. The Westchester/Veterans and Crenshaw/Imperial TOD Plan areas have been mapped by the California Department of Mines and Geology primarily as MRZ-1, an area where adequate information indicates a low likelihood of significant mineral resources. Some areas are also zoned MRZ-3, indicating that the significance of mineral deposits cannot be determined from the available data. However, there are no lands designated MRZ-2, which encompass areas where adequate information indicates that significant mineral deposits are present, or there is a likelihood of their presence, and development should be controlled, within or near the Westchester/Veterans and Crenshaw/Imperial areas.

The intent of designating significant mineral deposits is to identify areas where mineral extraction could occur prior to other types of development. Therefore, the proposed TOD Plans for the Westchester/Veterans and Crenshaw/Imperial areas would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state and would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. The TOD Plans would therefore have no impact on mineral resources.

3.2.5 TRANSPORTATION: SUBSTANTIAL HAZARDS DUE TO INCOMPATIBLE USES

Among the CEQA Guidelines Appendix G thresholds is the question as to whether a project would substantially increase hazards due to geometric design features or incompatible uses. While the Westchester/Veterans and Crenshaw/Imperial TOD Plans propose increased development intensities for residential and non-residential uses within the TOD Plan areas, the TOD Plans would not introduce new large-scale truck-intensive uses such as warehouses or other uses that would place incompatible forms of traffic on the area's road system (e.g., farm equipment). Thus, no impact would result in relation to substantial increases in hazards due to incompatible uses.

3.2.6 WILDFIRE

The Westchester/Veterans and Crenshaw/Imperial TOD Plan areas are within a fully urban setting, have long been developed, and do not contain or abut any natural areas where wildfire might occur. Therefore, the Westchester/Veterans and Crenshaw/Imperial TOD Plans would have no impact in relation to wildfire.

3.2.7 REFERENCES

California Department of Conservation, California Geologic Survey, SMARA Mineral Land Classification Data Portal, 2015. Available online:
<http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>, Accessed March 23, 2016.

EIP Associates, *General Plan Update Technical Background Report*, August 2006.

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3.3 LAND USE AND PLANNING POLICY

3.3.1 INTRODUCTION

a. Overview

This section examines the potential for the proposed for the Westchester/Veterans and Crenshaw/Imperial Transit Oriented Development (TOD) Plans to (1) physically divide an established community, or (2) cause a significant environmental effect due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

In accordance with CEQA Guidelines Section 15125(d), this section provides a summary of the plans, policies, and regulations of the City of Inglewood and regional, state, and federal agencies that have policy and regulatory control over the proposed development within the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas.

b. Definitions

Buffer refers to land and/or improvements designated to protect one type of land use from another in order to eliminate or minimize compatibility issues.

Density/intensity of use refers to the number of residential dwelling units per acre of land for residential uses, or floor area ratio (FAR), which expresses the ratio of building area per acre of land for non-residential uses.

Existing land use consists of the current use of land at the time of EIR baseline (October 2017).

General Plan refers to the officially adopted plan represents the comprehensive, long-term general plan for the physical development of city adopted pursuant to the requirements of California Government Code Sections 65300-65303.4. The General Plan of the City of Inglewood is the City's core policy and land use planning document.

Land use compatibility refers to the characteristics of different uses or activities that permit them to be located near each other in harmony and without conflict. Some elements affecting compatibility include:

- Intensity of occupancy as measured by dwelling units per acre, floor area ratio, or building heights;
- Pedestrian or vehicular traffic generated;
- Volume of goods handled; and

- Environmental effects such as noise, vibration, glare, air pollution, or the presence of hazardous materials.

Permitted land uses refers to the specific uses consistent with the General Plan and Zoning designations for a particular site or area.

Planned land use refers to the General Plan and Zoning land use designations for a particular site or area.

Zoning refers to the written regulations and laws that implement the City’s General Plan and define how property in specific geographic zones can be used pursuant to the planning and zoning law of the State, as contained in Government Code Title 7, Division 1, Chapter 4 (commencing with Section 65800). Zoning specifies the permitted uses within zones, and also regulates lot size, placement, bulk, and height of structures. Within the City of Inglewood, zoning regulations are set forth in Chapter 12, Planning and Zoning, of the Municipal Code.

3.3.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

Implementation of the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans is subject to a range of regional and local plans, policies, and regulations, which are described below.

a. Regional Plans, Policies, and Regulations

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted “Connect SoCal,” the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Connect SoCal integrates transportation planning with economic development and sustainability planning to comply with state greenhouse gas (GHG) emissions reduction goals, such as Senate Bill 375.

Southern California will grow from 9 million people, 6 million households, and 8 million jobs in 2020 to 22.5 million people, 7.6 million households, and 10 million jobs in 2045. During that time, transportation infrastructure will need to substantially expand while also meeting the GHG emissions-reduction targets set by the California Air Resources Board.

SCAG is empowered by state law to assess regional housing needs and provide a specific allocation of housing needs for all economic segments of the community for each of the region’s counties and cities. The determination of each city’s and county’s share of regional housing needs that is required by law to be reflected in municipal General Plan housing elements is based on the growth projections of the RTP/SCS.

Connect SoCal projects that Inglewood will grow from a population of 120,800 in 2020 to 129,000 people in 2040. Between 2020 and 2040, Connect SoCal projects that the number of households in Inglewood will grow from 40,400 to 43,300, while local employment opportunities will increase from 9,900 to 10,900.

The following strategies are intended to be supportive of implementing the regional Sustainable Communities Strategy. Several are directly tied to supporting related GHG reductions while others support the broader goals of Connect SoCal:

Focus Growth Near Destinations & Mobility Options

- Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.
- Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.
- Plan for growth near transit investments and support implementation of first/last mile strategies.
- Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.
- Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.
- Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).
- Identify ways to “right size” parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)

Promote Diverse Housing Choices

- Preserve and rehabilitate affordable housing and prevent displacement.
- Identify funding opportunities for new workforce and affordable housing development.
- Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply.
- Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.

Leverage Technology Innovations

- Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space.
- Improve access to services through technology – such as telework and telemedicine as well as other incentives such as a “mobility wallet,” an app-based system for storing transit and other multi-modal payments.
- Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation.

Support Implementation of Sustainability Policies

- Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.
- Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations.
- Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space.
- Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies.
- Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region.
- Continue to support long range planning efforts by local jurisdictions.
- Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy.

Promote a Green Region

- Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.
- Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.
- Integrate local food production into the regional landscape.

- Promote more resource efficient development focused on conservation, recycling, and reclamation.
- Preserve, enhance, and restore regional wildlife connectivity.
- Reduce consumption of resource areas, including agricultural land.
- Identify ways to improve access to public park space.

Connect SoCal identifies Priority Growth Areas (PGAs) that follow the principles of “center-focused placemaking,” including “locations where many Connect SoCal strategies can be fully realized.” Connect SoCal identifies several types of PGAs – Job Centers, Transit Priority Areas, High-Quality Transit Areas, Neighborhood Mobility Areas, Livable Corridors, and Spheres of Influence – that account for only 4 percent of region’s total land area, while accommodating 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2016 and 2045.

The purpose of this more compact form of regional development is to:

- Reduce travel distances;
- Increase mobility options;
- Improve access to workplaces; and
- Conserve the region’s resource areas.

Although the region will see benefits from infill development, Connect SoCal also encourages to actively acknowledge and plan for potential impacts such as displacement of existing residents.

The Westchester/Veterans and Crenshaw/Imperial TOD areas are identified as Transit Priority Areas (TPAs), which are Priority Growth Areas that are within one half mile of existing or planned ‘major’ transit stops¹. Connect SoCal envisions Transit Priority Areas as areas where “TOD can be realized – where people can live, work and play in higher density, compact communities with ready access to a multitude of safe and convenient transportation alternatives.” Connect SoCal states that focusing regional growth in areas with planned or existing transit stops is “key to achieving equity, economic, and environmental goals. Infill within TPAs can reinforce the assets of existing communities, efficiently leveraging existing infrastructure and potentially lessening impacts on natural and working lands. Growth within TPAs supports Connect SoCal’s strategies for preserving natural lands and farmlands and alleviates development pressure in sensitive resource areas by promoting compact, focused

¹ A ‘major’ transit stop is defined as a site containing an existing or planned rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

infill development in established communities with access to high-quality transportation.” Transit Priority Areas comprise less than 1 percent of Southern California’s land area, while accommodating approximately 30 percent of projected new households within Southern California between 2020 and 2045.

b. Local Plans, Policies, and Regulations

City of Inglewood General Plan

The City of Inglewood General Plan includes the following goals and policies that are relevant to the proposed TOD Plans.

Land Use Element

Goals:

- Provide for the orderly development and redevelopment of the City while preserving a measure of diversity among its parts. Allocate land in the City to satisfy the multiple needs of residents but recognize that land is a scarce resource to be conserved rather than wasted.
- Help promote sound economic development and increase employment opportunities for the City’s residents by responding to changing economic conditions.
- Maximize the use and conservation of existing housing stock and neighborhoods and also facilitate development of new housing to meet community needs.
- Promote Inglewood’s image and identity as an independent community within the Los Angeles metropolitan area.
- Encourage the preservation of Inglewood’s fair share of housing for low- and moderate-income persons.
- Safeguard the City’s residential areas from the encroachment of incompatible uses.
- Protect local businessmen and encourage the importance of maintaining a strong commercial district in the downtown.
- Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood’s major streets.
- Pursue the continued acquisition and development of parks and recreation facilities to the extent feasible within the City’s budgetary capability.
- Maintain the present high level of police and fire services to the extent it is fiscally prudent.
- Encourage the retention of high-quality library services.

Housing Element

The Inglewood General Plan Housing Element sets forth goals, policies, and programs to address the City's existing and projected need for housing in the community in terms of affordability, availability, adequacy, and accessibility, pursuant to state law. The goals and supporting policies in the Housing Element that are relevant to the proposed TOD Plans are identified in Section 3.3.5, **Table 3.3-4**, below.

Inglewood Zoning Ordinance

Chapter 12, Planning and Zoning, of the Inglewood Municipal Code contains the City's Zoning Ordinance, which is the primary instrument for land use development. The Zoning Ordinance describes various types of zoning districts and land use classifications, land use regulations, development standards, and environmental standards. The Zoning Ordinance's purpose is to protect and promote the public's health, safety, and general welfare, and to implement the policies of the comprehensive General Plan.

3.3.3 ENVIRONMENTAL SETTING

a. Existing Land Uses

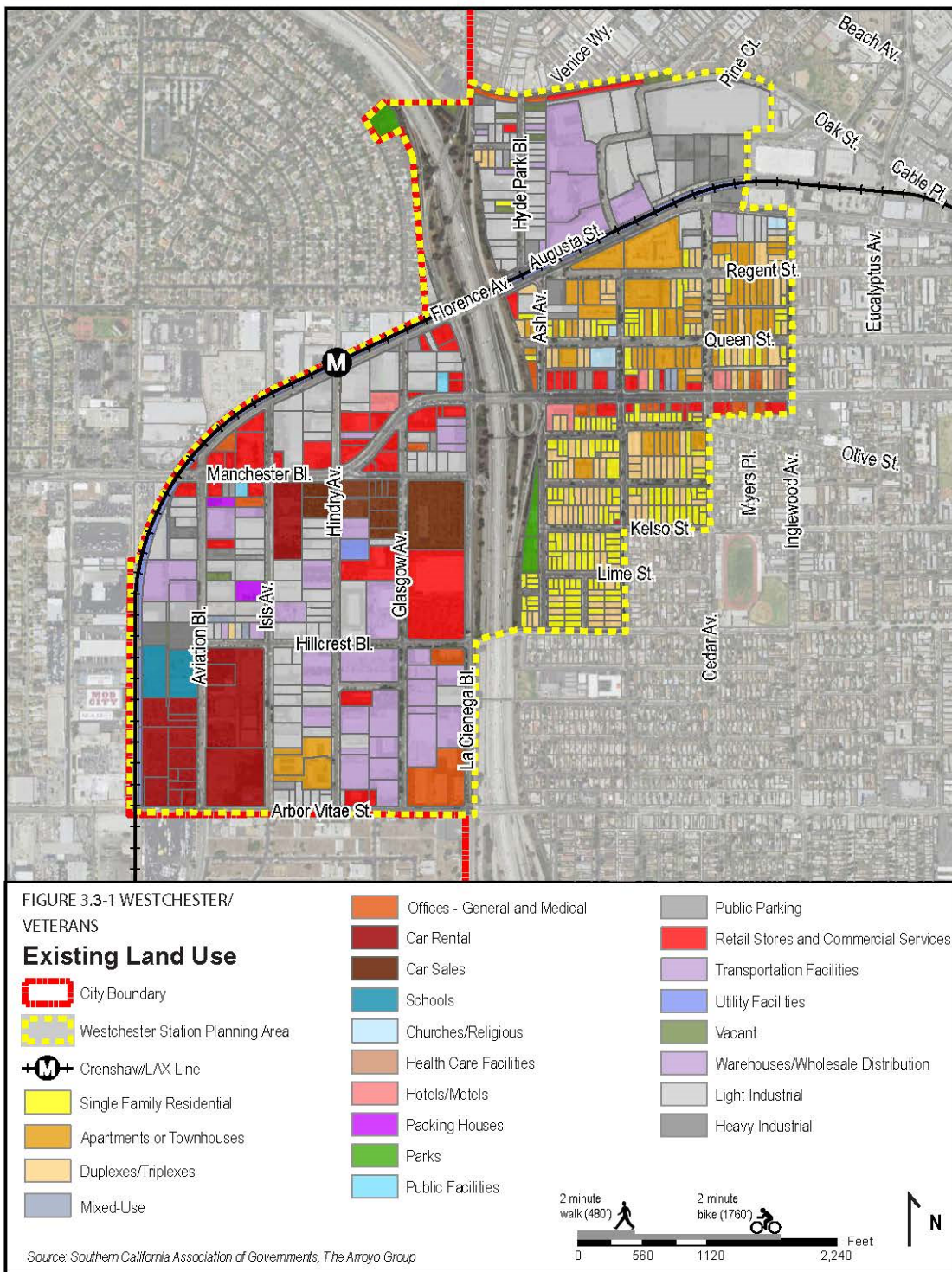
The Westchester/Veterans and Crenshaw/Imperial areas have long been urbanized, and remaining vacant land consists of developed land where previous previously constructed buildings have been demolished in anticipation of future development. The TOD Plan areas contain a variety of building types and designs, representing a range of time periods and architectural styles, from the 1920s through the 1990s. Open spaces within the TOD Plan areas consist of man-made parks and plazas, as well as landscaped areas that also have an urban and developed character.

Figures 3.3-1 and **3.3-2** show existing land uses in the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas, respectively. **Tables 3.3-1** and **3.3-2** provide quantified breakdown of these uses. As shown in **Figure 3.3-1**, residential uses within the Westchester/Veterans area are concentrated east of the I-405 freeway, south of Florence Avenue. Retail uses and car sales are generally concentrated along Manchester Boulevard. Car rental facilities related to LAX are concentrated in the southwestern portion of the TOD Plan area along Aviation Boulevard. A mix of industrial uses, encompassing nearly one-third of the TOD Plan area, are generally located west of the I-405 freeway south of Florence Avenue.

TABLE 3.3-1: EXISTING LAND USES IN THE WESTCHESTER/VETERANS TOD PLAN AREA

Existing Land Use	Land Area (Acres)	Percentage of TOD Plan Area
Residential Uses	67.98	15.74%
Single-Family Residential	20.49	4.74%
Duplexes/Triplexes	20.98	4.86%
Apartments or Townhouses	26.51	6.14%
Commercial and Office Uses	76.18	17.65%
Offices - General and Medical	8.38	1.94%
Retail Stores and Commercial Services	28.92	6.70%
Hotels/Motels	2.41	0.56%
Car Rental	24.93	5.77%
Car Sales	11.17	2.59%
Health Care Facilities	0.37	0.09%
Industrial	126.82	29.36%
Light Industrial	72.00	16.67%
Heavy Industrial	7.18	1.66%
Packing Houses	1.31	0.30%
Warehouses/Wholesale Distribution	46.33	10.73%
Mixed Use	1.12	0.26%
Public/Institutional Uses	21.78	5.05%
Public Facilities	0.63	0.15%
Public Parking	6.08	1.41%
Churches or Religious Institutions	1.22	0.28%
Schools	3.81	0.88%
Transportation Facilities	0.29	0.07%
Utility Facilities	9.75	2.26%
Parks	2.75	0.64%
Vacant	2.10	0.49%
Total Net Acres	298.73	69.16%
Rights-of-way	133.19	30.84%
Total Gross Acres	431.93	100.00%

Source: Existing Conditions Study, The Arroyo Group, January 2017.



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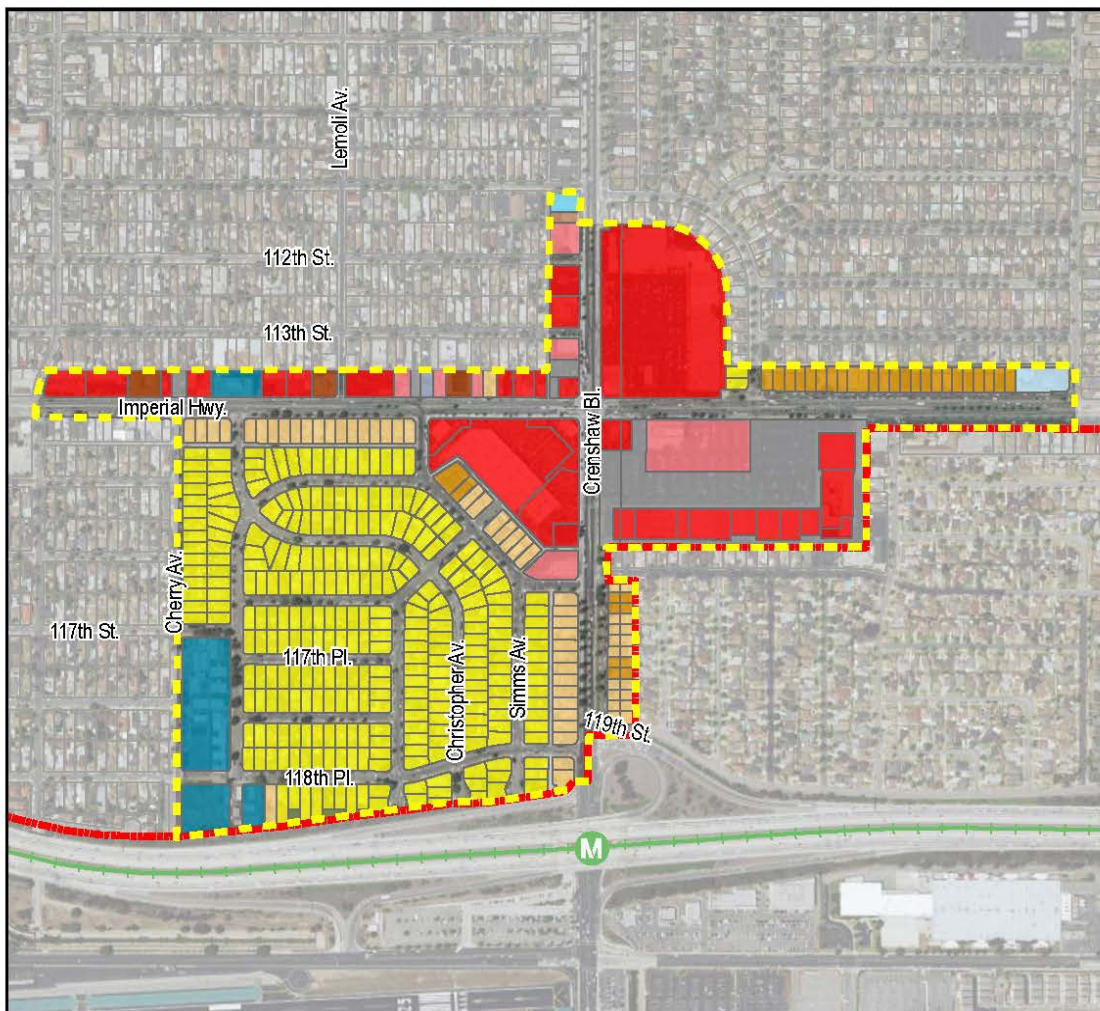


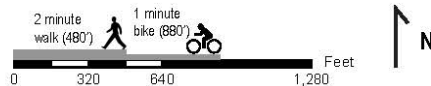
FIGURE 3.3-2

CRENSHAW/IMPERIAL

Existing Land Use



Source: Southern California Association of Governments, The Arroyo Group



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TABLE 3.3-2: EXISTING LAND USES IN THE CRENSHAW/IMPERIAL TOD PLAN AREA

Existing Land Use	Land Area (Acres)	Percentage of TOD Plan Area
Residential Uses	106.90	48.28%
Single-Family Residential	86.26	39.00%
Duplexes/Triplexes	14.14	6.39%
Apartments or Townhouses	6.40	2.89%
Commercial and Office Uses	38.17	17.25%
Offices - General and Medical	6.95	3.14%
Retail Stores and Commercial Services	29.29	13.24%
Hotels/Motels	1.77	0.80%
Health Care Facilities	0.16	0.07%
Mixed Use	0.18	0.08%
Public/Institutional Uses	24.48	11.07%
Public Facilities	0.33	0.15%
Public Parking	10.62	4.80%
Churches or Religious Institutions	3.13	1.42%
Schools	10.40	4.70%
Vacant	0.59	0.27%
Total Net Acres	170.32	76.95%
Rights-of-way	50.86	23.05%
Total Gross Acres	221.18	100.00%

Source: Existing Conditions Study, The Arroyo Group, January 2017.

The Crenshaw/Imperial TOD Plan area encompasses the four quadrants of the Crenshaw Boulevard/Imperial Highway intersection, each of which has been developed for commercial use. The northwestern quadrant of the intersection generally consists of commercial uses along the frontage of Crenshaw Boulevard and Imperial Highway. The other three quadrants of the intersection have been developed with shopping centers. A large multi-story office building is also located in the southeastern quadrant of the intersection. A large single-family neighborhood is located within the Crenshaw/Imperial TOD Plan area south of Imperial Highway, west of Crenshaw Boulevard. Duplex/triplex units front along these streets to the west and south of the commercial center at the intersection of Crenshaw Boulevard and Imperial Highway.

b. Existing Adjacent Land Uses

Existing uses adjacent to the Westchester/Veterans TOD Plan area consist primarily of single- and multi-family residential neighborhoods to the northwest, north, and east. A mix of commercial and industrial uses are located adjacent to the southwestern portion of the TOD Plan area. Los Angeles International Airport is less than two miles southwest of the TOD Plan area.

Single-family residential neighborhoods surround the Crenshaw/Imperial TOD Plan area to the north, west, east, and southeast. The area south of the TOD Plan area across the I-105 freeway includes the Hawthorne Airport and industrial uses west of Crenshaw Boulevard, and a commercial shopping center east of Crenshaw Boulevard.

c. Existing Character Defining Features

Westchester/Veterans TOD Plan Area

Figure 3.3-3 maps Character-Defining Features in the Westchester/Veterans TOD Plan area, as well as the area's major land uses. These include two important historic elements, significant uses, and unique architectural elements. The character of the western side of the TOD Plan area is largely industrial and automobile- and airport-related.

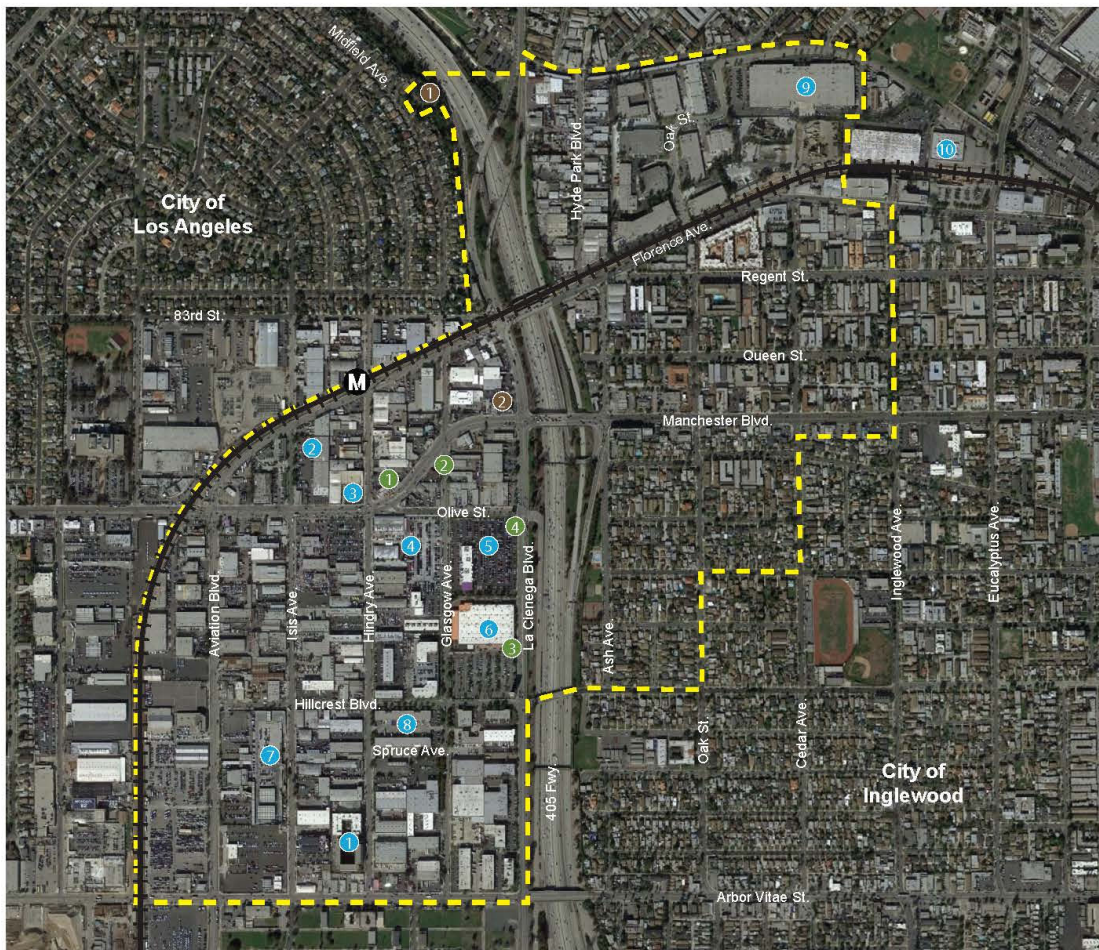


FIGURE 3.3-3
WESTCHESTER/VETERANS
Character-Defining Features

Planning Area Boundary

Future Crenshaw/LAX Line

Significant Uses

- Veterans Housing
- Three Weavers Brewery
- 1019 Building Artist Studios
- Hyundai Dealership
- Cammax Dealership
- Home Depot
- National Car Rental
- Prologis Airfreight Distribution Center
- Marvin Engineering
- Faithful Central Bible Church

Historic Elements

- Centinela Adobe
- Randy's Donuts

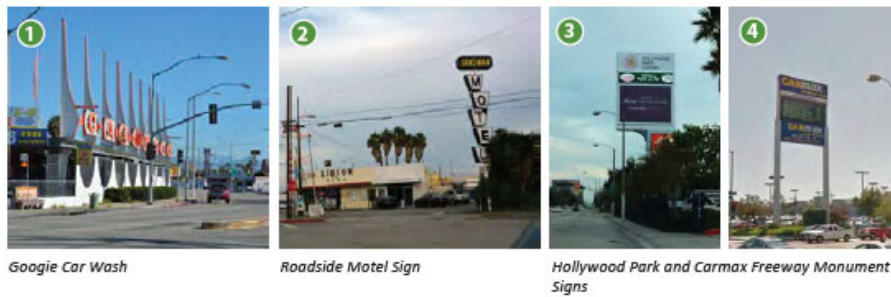
Unique Architectural Elements

- Googie Car Wash
- Roadside Motel Sign
- Hollywood Park Freeway Monument Sign
- Cammax Freeway Monument Sign

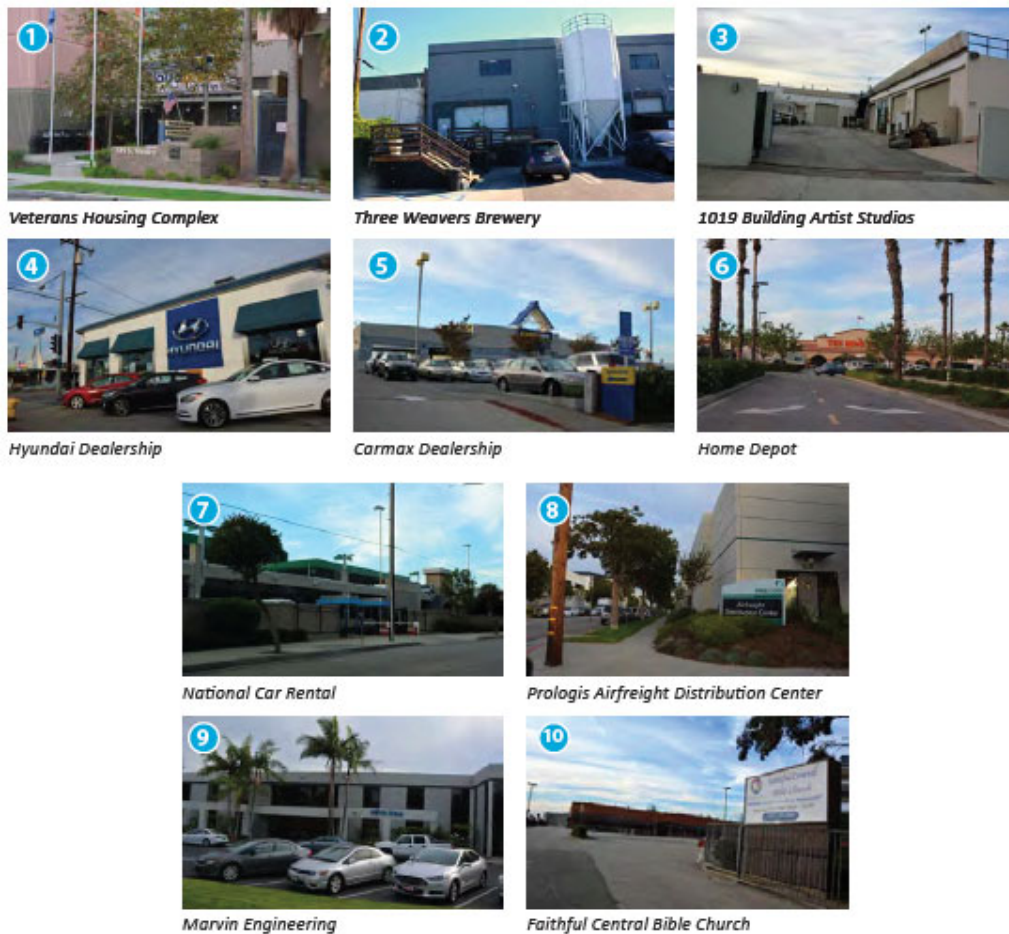


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Figure 3.3-3 Unique Architectural/Signage Elements



Significant Uses



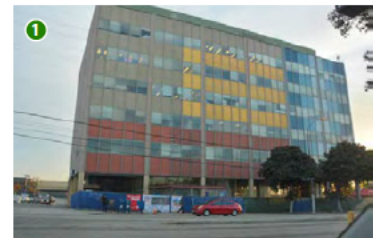
Crenshaw/Imperial TOD Plan Area

Figure 3.3-4 maps Character-Defining Features in the Crenshaw/Imperial TOD Plan area, as well as the area’s major land uses. The Crenshaw/Imperial TOD Plan area’s built character generally reflects its identity as an ethnically diverse, mid-century suburban area.

The character of the area is largely set by the three shopping centers at the corner of Crenshaw Boulevard and Imperial Highway. Of the three, Crenshaw Imperial Plaza (southeast corner) is the largest, with a plaza space and a six-story office building which lends a bit more of an urban character to the area as a whole.

The existing residential neighborhood in the southwest quadrant of the Crenshaw/Imperial intersection has a family-friendly character, dominated by single-family homes but also a proliferation of schools and churches. Schools include public schools with standard campuses, independent charter schools which have taken up residence in office buildings, and church-affiliated charter schools on the grounds of churches. Churches are key gathering places in the community, and in some cases key visual elements of the cityscape.

Architectural/Urban Design Elements



Crenshaw Imperial Plaza Office Tower



Crenshaw Imperial Plaza - Plaza Space

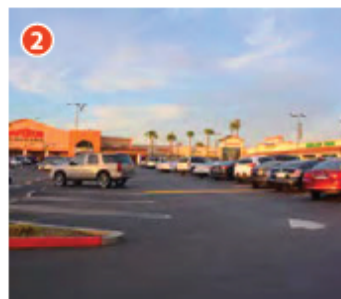


Crenshaw Station and Crenshaw Boulevard Gateway, viewed from the north

Shopping Centers



Crenshaw Imperial Plaza



One Imperial Plaza



Inglewood Plaza

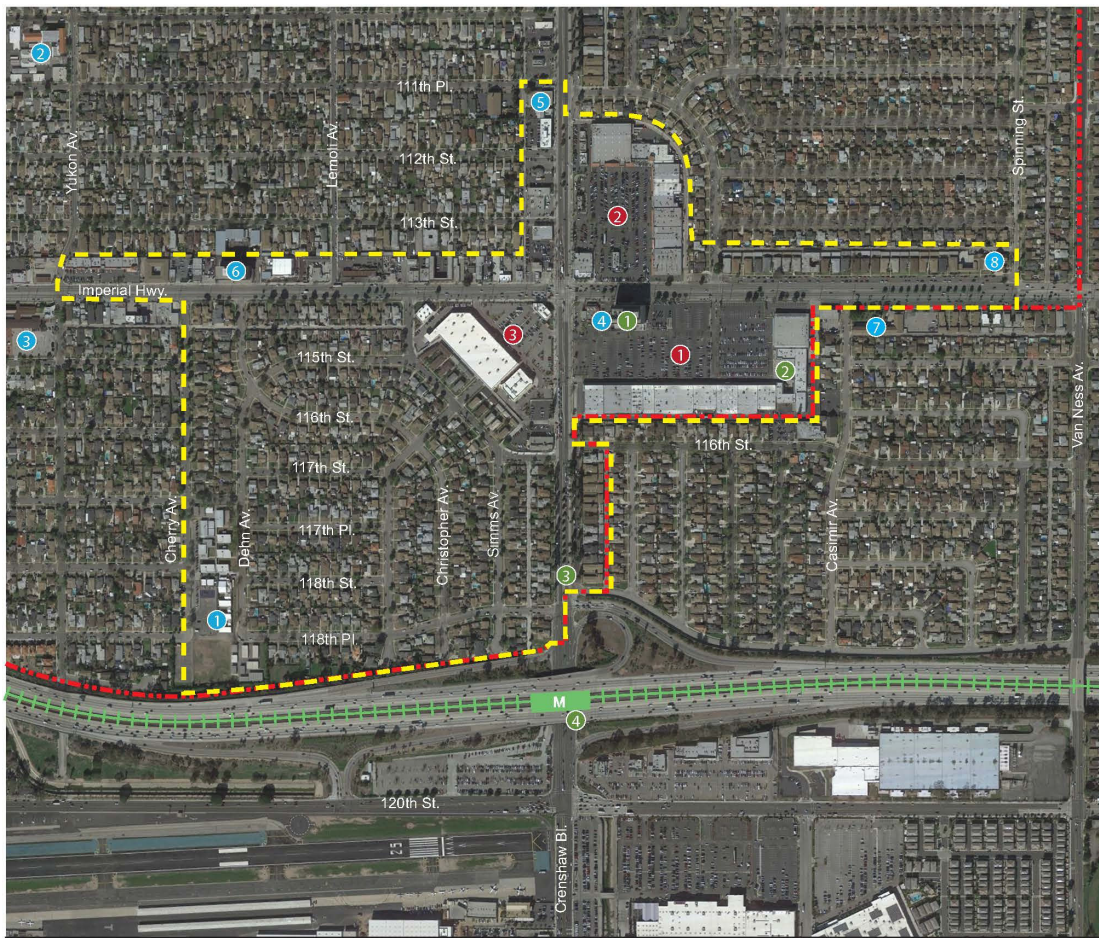




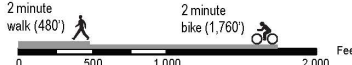


FIGURE 3.3-4
CRENSHAW/IMPERIAL
Character-Defining Elements

	City of Inglewood Boundary	Schools/Churches	Shopping Centers
	Planning Area Boundary	① Bennett/Kew Elementary School	① Crenshaw Imperial Plaza
	Metro Green Line	② Worthington Elementary School	② One Imperial Plaza
Architectural/Urban Design Elements		③ Concordia Lutheran Church/ Environmental Charter Middle School	③ Inglewood Plaza
①	Crenshaw Imperial Plaza Office Tower	④ Mission View Charter School	
②	Crenshaw Imperial Plaza - Plaza Space	⑤ First Foursquare Church/ Children of Promise School	
③	City of Inglewood Gateway Sign & Planted Median	⑥ Today's Fresh Start Charter School	
④	Crenshaw Green Line Station	⑦ Olivet Lutheran Church	
		⑧ Christ Centered A.R.M.E.D. Min./College Bridge Academy	





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Schools/Churches



Bennett/Kew Elementary School



Worthington Elementary School



*Concordia Lutheran Church/
Environmental Charter Middle School*



Mission View Charter School



*First Foursquare Church/
Children of Promise School*



Today's Fresh Start Charter School



Olivet Lutheran Church



*Christ Centered A.R.M.E.D. Ministry/
College Bridge Academy*

3.3.4 SIGNIFICANCE CRITERIA

Criteria outlined in CEQA Guidelines were used to determine the level of significance of impacts related to land use and planning policy. Appendix G of State CEQA Guidelines indicates that a project would have a significant effect if it were to:

LUP-1 Physically divide an established community; or

LUP-2 Result in a significant environmental effect due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

3.3.5 IMPACTS AND MITIGATION MEASURES

Threshold LUP-1: Physically divide an established community.

Impact LUP-1: Development that would be permitted by the proposed Westchester/Veterans and Crenshaw/Imperial Transit Oriented Development Plans would not create any physical barriers that would eliminate or reduce levels of connectivity between existing neighborhoods or within the existing community. The TOD plans would therefore not physically divide an existing community. No impact would occur.

Methodology

The analysis related to this threshold considers whether proposed Westchester/Veterans and Crenshaw/Imperial Transit Oriented Development Plans would create new physical barriers that would eliminate or reduce existing levels of connectivity between areas of existing communities and neighborhoods to the extent that persons in one portion of the community or neighborhood would be physically separated from or would be constrained in movements to or from other areas of the community or neighborhood.

Impact Assessment

The TOD Plan areas encompass an urban setting that has long been developed with a mix of residential, commercial, industrial, and public uses. The uses within the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas are well connected via roadways, as well as pedestrian and bicycle routes. New development permitted by the TOD Plans would be centered around the Westchester/Veterans Metro station, which is currently under construction as part of the Crenshaw/LAX Metro line and the existing Crenshaw station along the Metro Green Line.

No permanent roadway closures are proposed that would create any physical barrier that would separate one portion of the community or neighborhood from other areas of the community or neighborhood. The only permanent road closure that might occur as the result of the proposed TOD Plans is the potential future closure of Isis Avenue north of Manchester Boulevard, which would provide publicly accessible open space. Because Isis Avenue does not cross the Metro rail line, connectivity for the area would be maintained via Aviation Boulevard/Florence Avenue, Manchester Boulevard, and Hindry Avenue, as is the present situation for uses in this area. Thus, closure of Isis Avenue would therefore not eliminate or reduce existing levels of connectivity between areas of the existing community.

The TOD Plans propose infill development utilizing an established roadway network and new transit services. The increase in development capacity proposed by the TOD Plans consists of

intensified development and a transit-oriented mix of land uses in proximity to transit stations. The TOD Plans do not introduce substantially different land uses or modify the existing distribution of land uses in a way that might isolate existing or proposed residential neighborhoods from each other or from schools, parks, or shopping and employment areas.

As the result of (1) enhancing facilities for bicycle and pedestrian movement, (2) providing enhanced access to Metro transit service, (3) creating new community gathering places, (4) providing a bridge/escalator connection and enhanced pedestrian facilities across Florence Boulevard, and (5) extending Redondo Boulevard to provide a more direct vehicular connection to the east side of Vincent Park, the proposed TOD Plans would establish a more integrated community and transportation network.

Significance Conclusion for Impact LUP-1

The proposed TOD plans would increase, rather than decrease connectivity within the Westchester/Veterans and Crenshaw/Imperial areas and would not physically divide any existing community. No impacts related to physical division of a community would occur.

Threshold LUP-2 **Conflict with plans, policies, and regulations intended to avoid or mitigate environmental effects.**

Impact LUP-2: **Development that would be permitted by the proposed Westchester/Veterans and Crenshaw/Imperial Transit Oriented Development Plans would not result in any significant environmental effects associated with a conflict between the TOD plans and any existing plan, policy, or regulation that was adopted to avoid or mitigate environmental effects. *No impact would occur.***

Methodology

An inconsistency with a land use or planning policy is not necessarily considered to be a physical environmental effect (impact) under CEQA; only those inconsistencies that result in physical effects on the environment are considered to be “impacts” and identified as such in this EIR.

This Section of the EIR evaluates the consistency of the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans with applicable plans, policies, and regulations intended to avoid or mitigate environmental effects, including the SCAG Regional Transportation Plan/Sustainable Communities Strategy and the Inglewood General Plan.

- Physical effects on the environment related to land use and planning policies are considered in the evaluation of specific environmental topics in this EIR, including

Section 3.6, *Traffic and Circulation*; Section 3.7, *Air Quality*; Section 3.8, *Greenhouse Gas Emissions*; Section 3.10, *Noise and Vibration*; Section 3.11, *Hazards and Hazardous Materials*; Section 3.13, *Geology, Soils, and Seismicity*; Section 3.15, *Utilities, Service Systems, and Water Supply*; and Section 3.16, *Recreational Resources*.

- The evaluations contained in this section related to consistency related to policies that are not associated with physical impacts represent factors that the City of Inglewood and Responsible Agencies will consider in their planning reviews of the proposed TOD Plans, along with subsequent site-specific development and infrastructure projects.

Impact Assessment

The analysis set forth in **Table 3.3-3**, below, evaluates the consistency of the proposed Westchester/Veterans and Crenshaw/Imperial Transit Oriented Development Plans with existing regional and Inglewood plans and policies. As described in detail below, the proposed TOD Plans would be consistent with applicable regional and local goals and policies that are intended to avoid or mitigate adverse environmental effects.

SCAG Regional Transportation Plan/Sustainable Communities Strategy

Table 3.3-3 lists the strategies from SCAG's 2020 Connect SoCal RTP/SCS that are relevant to the proposed TOD Plans. SCAG strategies focus largely on implementing transit-oriented development and increasing the use of regional transit, encouraging development patterns and densities that reduce infrastructure costs, and providing affordable and a variety of housing types.

The proposed TOD Plans would implement SCAG strategies related to high-density, infill development, and improvement of the job/housing balance that is centered around public transit opportunities. The proposed TOD Plans provide for infill development in an already developed urban area that would make use of the existing circulation and utility infrastructure. The proposed TOD Plans also introduce high-density residential uses and create a mixed-use environment in which residents would benefit from nearby shopping and employment opportunities. New development would be within walking distance of Metro stations, one of which is currently under construction. Thus, the TOD Plans would be consistent with SCAG strategies to provide infill residential and mixed-use development and increase the availability of transit-oriented development. In addition, green building measures, such as water efficiency, Low Impact Development, and renewable energy sources would be implemented by the proposed TOD Plans to reduce GHG emissions. Overall, the proposed TOD Plans would be consistent with SCAG's 2020 Connect SoCal RTP/SCS.

TABLE 3.3-3: CONSISTENCY WITH APPLICABLE CONNECT SOCAL RTP/SCS STRATEGIES

Existing Plan and Policies	Consistency with Existing Policies
2020 Connect SoCal Strategies	
Focus Growth Near Destinations & Mobility Options	
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	Consistent. The proposed TOD Plans establish higher intensity mixed use land use patterns near two Metro Stations to increase opportunities for transit use and reduce reliance on the automobile.
Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.	Consistent. The proposed TOD Plans align economic development with transit availability by focusing revitalization efforts on two transit stations along the Metro Crenshaw/LAX and Green lines. The TOD Plans also substantially increase the number of dwelling units and square footage of employment-generating uses in proximity to the Westchester/Veterans and Crenshaw Metro stations and improved the City's jobs/housing balance.
Plan for growth near transit investments and support implementation of first/last mile strategies.	Consistent. The proposed TOD Plans provide improvements to area pedestrian and bicycle facilities, and emphasizes transit use, including specific improvements to maximize access to the Metro Crenshaw/LAX and Green lines.
Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.	Consistent. The proposed TOD Plans align economic development with transit availability by focusing revitalization efforts on two transit stations along the Metro Crenshaw/LAX and Green lines. Proposed land uses in the TOD Plans are based on economic studies aimed at identifying areas of Inglewood's economic competitiveness.
Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.	Consistent. The proposed TOD Plans identify key development and redevelopment parcels that would provide for infill mixed land uses in proximity to Metro stations for infill and investment.
Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).	Consistent. By increasing the intensity of development adjacent to the Westchester/Veterans and Crenshaw Metro stations, along with enhancing access to the stations, the proposed TOD Plans maximize the productivity of the transit, pedestrian, and bicycle systems while maintaining the productivity of the areas' vehicular systems. The TOD Plans also provide for improvements to the areas' circulation systems in order to increase the safety and efficiency for a variety of users, including transit riders, pedestrians, and cyclists.
Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking).	Consistent. Recognizing the intended transit orientation of new development within the Westchester/Veterans and Crenshaw/Imperial areas propose the following: <ul style="list-style-type: none"> • Reductions in minimum parking requirements for the uses and locations that are most amenable to transit use. • Providing for conversion of portions of the large shopping center parking lots on the southwest, southeast, and northeast corners of Crenshaw Boulevard and Imperial Highway to mixed-use development, providing the neighborhood with more housing options, expanded open space, and better-quality commercial tenants. • Conversion of the existing parking lot for the 1019WEST artist studios on Manchester Boulevard at Hindry Avenue into an arts park, providing for artists at that location to exhibit their works in the park and enliven the area.

Existing Plan and Policies	Consistency with Existing Policies
	<ul style="list-style-type: none"> In addition, the TOD Plans provide for the potential to convert the westbound travel and parking lane on Olive Avenue between Manchester Boulevard and Glasgow Avenue to open space.
Promote Diverse Housing Choices	
Preserve and rehabilitate affordable housing and prevent displacement.	Consistent. The TOD Plans provide for new housing in mixed use settings and higher density multi-family settings to provide for changing demands in housing types. The TOD Plans provide for preservation of more than 98 percent of the Plan area’s housing stock (6,600 dwelling units), displacing only about 120 existing dwelling units. However, the City’s existing housing vacancy rate provides ample housing opportunities for displaced residents in the short-term and the TOD Plans would result in a net increase in available housing of 4,090 dwelling units.
Identify funding opportunities for new workforce and affordable housing development.	Consistent. The TOD Plans provide for a substantial amount of new housing in proximity to transit and major employment centers surrounding the Los Angeles International Airport. The Plans also provide for future consideration of an inclusionary zoning policy to require affordable housing within new residential developments.
Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply.	Not applicable. Issues related to accessory dwelling used are being addressed citywide. The TOD Plans provide for a net increase in available housing of 4,090 dwelling units.
Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.	Not applicable. Issues related to streamlining the City’s development review process and lessening barriers to the production of housing are addressed in the citywide General Plan Housing Element. The TOD Plans provide for a substantial net increase in housing units in proximity to transit and major jobs centers. As demonstrated in Draft EIR Section 3.9, GHG emissions resulting from the TOD Plans will be consistent with SB32 GHG reduction targets.
Leverage Technology Innovations	
Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space.	Consistent. The TOD Plans provide for extensive improvements to the area’s infrastructure, including dedicated bicycle lanes.
Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a “mobility wallet,” an app-based system for storing transit and other multi-modal payments.	Not applicable. Issues related to technological improvements are being addressed on a citywide and regional basis.
Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation.	Not applicable. Issues related to “micro-power grids” would be addressed on a citywide and regional basis.
Support Implementation of Sustainability Policies	
Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.	Consistent. The TOD Plans, which were funded with Metro grant money, implement development standards, and provide for high density, mixed use development in proximity to transit and major employment centers that will result in substantial per capita reductions in GHG emissions.
Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations.	Not applicable. This measure would be addressed on a citywide basis.

Existing Plan and Policies	Consistency with Existing Policies
Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space.	Consistent. The TOD Plans provide for establishment of a wide variety of financing methods for infrastructure, parks, and other public improvements.
Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies.	Not applicable. This measure would be addressed on a citywide basis.
Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region.	Not applicable. This measure is intended for implementation by regional agencies.
Continue to support long range planning efforts by local jurisdictions.	Not applicable. This measure is intended for implementation by regional agencies.
Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy.	Not applicable. This measure is intended for implementation by regional agencies.
Promote a Green Region	
Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	Consistent. Development and implementation of climate adaption and hazard mitigation plans would occur on a cityside basis. The TOD Plans provide for high density, mixed use development in proximity to transit and major employment centers that achieve per capita in GHG emissions reduction targets.
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	Not applicable. This measure is intended for implementation by regional agencies.
Integrate local food production into the regional landscape.	Not applicable. This measure is addressed in the City's Environmental Justice General Plan Element.
Promote more resource efficient development focused on conservation, recycling, and reclamation.	Not applicable. This measure would be addressed on a citywide basis.
Preserve, enhance, and restore regional wildlife connectivity.	Not applicable. The City of Inglewood does not contain biological habitats for which wildlife connectivity would be an issue.
Reduce consumption of resource areas, including agricultural land.	Consistent. By providing for a substantial net increase in high density housing and employment opportunities in proximity to transit, the TOD Plan would consumption of agricultural land.
Identify ways to improve access to public park space.	Consistent. The TOD Plans for improved access to parks and recreational open space areas.

City of Inglewood General Plan

Table 3.3-4 lists the policies from the City of Inglewood General that are relevant to the proposed TOD Plans. General Plan policies focus largely on orderly infill development, facilitation of mixed-uses, provision of housing for all income level households, improvement of aesthetics, provision of public services, safety from seismic effects, use of alternative energy sources, and prevention of land use consistency conflicts.

The proposed TOD Plans implement General Plan policies related to high-density, infill development, and increasing use of alternative methods of circulation that is centered around Metro Stations, pedestrian, and bicycle facilities. The proposed TOD Plans provide for infill development that would make use of the existing circulation and utility infrastructure and provide affordable housing opportunities. In addition, General Plan policies include use of alternative energy sources and energy efficiency that would be implemented by the proposed TOD Plans. Because the proposed TOD Plans would be consistent with the City's General Plan, they would not result in conflict with the City's General Plan.

TABLE 3.3-4: CONSISTENCY WITH APPLICABLE INGLEWOOD GENERAL PLAN POLICIES

Relevant Inglewood General Plan Policies	Consistency with General Plan Policies
Land Use Element	
Provide for the orderly development and redevelopment of the City while preserving a measure of diversity among its parts. Allocate land in the City to satisfy the multiple needs of residents but recognize that land is a scarce resource to be conserved rather than wasted.	Consistent. The proposed TOD Plans provide for orderly infill and re-development of the TOD Plan areas and would preserve a measure of diversity among the various Districts in the plans. As described above and below, the TOD Plan areas has been divided into several districts that are distinctly different, but linked through roadways, bikeways, and pedestrian travel routes to be able to meet the multiple needs of residents, such as retail, employment, and residential needs. The infill development the TOD Plans provide for recognize that land is a scarce resource and thus, propose infill and redevelopment within the TOD Plan areas.
Help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions.	Consistent. The proposed TOD Plans involve infill development that would make better use of the land within the Plan areas and would contribute to the economic stability of Inglewood by provision of both jobs and commercial, industrial, and institutional uses.
Maximize the use and conservation of existing housing stock and neighborhoods and also facilitate development of new housing to meet community needs.	Consistent. The proposed TOD Plans would provide for orderly infill and re-development of the Plan areas and would preserve the existing housing stock. In addition, the TOD Plans provide for new and improved housing.
Promote Inglewood's image and identity as an independent community within the Los Angeles metropolitan area.	Consistent. The public realm improvements, landscaping, and design standards that would be implemented by the proposed TOD Plans would build upon and improve the existing identity and character of the City.
Encourage the preservation of Inglewood's fair share of housing for low- and moderate-income persons.	Consistent. The proposed TOD Plans provide for new mixed uses that include multi-family residential units to be located above employment generating uses. The new multi-family residential uses provided by the TOD Plans would also help provide housing for low- and moderate-income households.
Safeguard the City's residential areas from the encroachment of incompatible uses.	Consistent. Detailed design guidelines are provided in the TOD Plans to protect existing residential neighborhoods. In addition, the TOD Plans do not propose new non-residential uses within residential neighborhoods other than uses that specifically serve the surrounding neighborhood.
Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood's major streets.	Consistent. As described below in Impact LUP-3, implementation of the design standards, architectural guidelines and streetscaping would create a sense of community, sense of place, and an overall improvement in the character of the TOD Plan areas. In addition, the

Relevant Inglewood General Plan Policies	Consistency with General Plan Policies
	proposed mixed and commercial uses are intended to improve the economic condition of the community,
Pursue the continued acquisition and development of parks and recreation facilities to the extent feasible within the City's budgetary capability.	Consistent. The proposed TOD would not include acquisition and development of parks; however, as described further below in Impact LUP-3, the TOD Plan includes the development of outdoor gathering places, such as plazas and other open space areas.
Maintain the present high level of police and fire services to the extent it is fiscally prudent.	Consistent. As described in Section 3.14, <i>Public Services</i> , the increased population and employment proposed by the TOD Plans would not substantially impact the existing level of police and fire services, and the existing level of police and fire services would be maintained.
Encourage the retention of high-quality library services.	Consistent. As described in Section 3.14, <i>Public Services</i> , the increased population and employment proposed by the TOD Plans would not substantially impact the existing level of library services, and the existing level of library services would be maintained.
Allow for planned development of mixed-use districts that integrate housing with retail, office, entertainment, and public uses, where housing may be developed on the upper floors of non-residential buildings or distributed horizontally on the site.	Consistent. As described above, the objective of the proposed TOD Plans is to implement land use patterns that would facilitate mixed-uses, such as residential, retail, and other employment uses near two Metro Stations. The mixed-use developments would largely consist of development of residential units above commercial uses.
Require that the ground floor of buildings integrating housing with non-residential uses must be occupied by retail, dining, and other uses that engage and activate pedestrian activity.	Consistent. As described above, the objective of the proposed TOD Plans is to implement land use patterns that would facilitate mixed-uses, such as residential, retail, and other employment uses. The ground level uses would be occupied with pedestrian oriented, active, retail, dining, and commercial uses.
Require that development in mixed-use districts conveys a high level of architectural design quality and landscape amenities, reflecting the traditions that historically have defined the City.	Consistent. The development of each TOD plan area would convey a high level of architectural design quality and landscape amenities by implementing the design standards that are included in the TOD plans, which were developed to reflect the traditions and history of the City.
Require that residential and non-residential portions of mixed-use buildings be seamlessly integrated by architectural design, pedestrian walkways, and landscape.	Consistent. The TOD Plans include design standards, which provide that mixed-use buildings are required to be integrated seamlessly with pedestrian walkways and landscaping.

Relevant Inglewood General Plan Policies	Consistency with General Plan Policies
<p>Require that planned development mixed-use districts seamlessly integrate uses and buildings as a cohesive project characterized by:</p> <ul style="list-style-type: none"> • A connected and unifying street and sidewalk network. • Consistent property setbacks, frontage design, and building massing. • Orientation and design of the ground floor of buildings to promote pedestrian activity. • Consideration of shared parking in lieu of separate parking for each use. • Transitions of development scale and mass and pedestrian linkages with adjoining neighborhoods and districts. 	<p>Consistent. The TOD Plans include design standards, which provide that mixed-use areas are required to be integrated seamlessly with pedestrian walkways/ sidewalks, landscaping. Also, the TOD Plans include setback requirements and frontage and architectural pedestrian scaled requirements that promote pedestrian activity. The TOD Plan include transitioning the scale and mass between new development and existing adjacent uses.</p>
<p>Require that buildings and improvements respect their setting and address elements such as location, slopes, drainages, native landscapes, and view sheds, as applicable.</p>	<p>Consistent. The TOD Plans include design standards, which provide that new site-specific development projects be integrated into the setting of the project site. This includes provision of consistent or improved landscaping and view sheds and maintaining existing slopes and drainages within the area.</p>
Housing Element	
<p>Goal 1: Promote the construction of new housing and new housing opportunities.</p>	<p>Consistent. The proposed TOD Plans provide for a net increase of up to 4,090 residential units. The new multi-family residential uses provided by the Plans would provide housing for a variety of income level households.</p>
<p>Policy 1.1: Provide adequate sites for all types of housing.</p>	<p>Consistent. The proposed TOD Plans provide for orderly infill and re-development of the Plan areas and would preserve the existing sound housing stock. In addition, the TOD Plans provide for new and improved housing.</p>
<p>Policy 1.3: Further streamline the permit approval process.</p>	<p>Consistent. The proposed TOD Plans provide for a streamlined permit approval process for future site-specific development projects within the TOD areas that are consistent with the TOD land use and design requirements.</p>
<p>Goal 3: Encourage the production and preservation of housing for all income categories, particularly around high-quality transit, including workers in the City that provide goods and services.</p>	<p>Consistent. The proposed TOD Plans provide for f new residential units to be located above employment-generating uses and near two Metro Stations. The new multi-family residential uses provided by the TOD Plans would provide housing for a variety of income households.</p>
<p>Policy 3.5: Encourage the construction of mixed income housing developments that provide housing for a variety of income levels such as extremely low-income up through and including market rate.</p>	<p>Consistent. The proposed TOD Plans provide for new mixed uses that include multi-family residential units to be located above employment-generating uses. The new multi-family residential uses provided by the Plans would provide housing for low- and moderate-income persons.</p>
<p>Policy 3.6: Provide development incentives for the construction of affordable housing.</p>	<p>Consistent. The proposed TOD Plans provide for a net increase of up to 4,090 residential units. The new multi-family residential uses provided by the Plans would provide housing for a variety of income level households. The mixed-use developments would largely consist of development of residential units above commercial uses, which would be of sufficient density to accommodate affordable housing. The TOD</p>

Relevant Inglewood General Plan Policies	Consistency with General Plan Policies
	Plans provide for streamlined approval of new developments that are consistent with the TOD Plans, which acts as incentive for development. The Plans also recognize California Density Bonus Law, which encourages the construction of affordable housing in mixed-income projects.
Policy 3.7: Explore targeting new housing development opportunities in close proximity to high quality transit.	Consistent. The objective of the proposed TOD Plans is to implement land use patterns that would facilitate mixed-uses, such as residential, retail, and other employment uses near two Metro Stations. The mixed-use developments would largely consist of development of residential units above commercial uses.
Goal 7: Encourage Energy Efficiency and Greenhouse Gas Reductions.	Consistent. The TOD Plans include energy efficient design standards and guidelines along with features that would increase water use efficiency. In addition, future site-specific development permitted by the TOD Plans would be subject to the City's Climate Action Plan for the reduction of greenhouse gas emissions.
Policy 7.1: Facilitate residential energy efficient construction and upgrades.	Consistent. The City would administer the CALGREEN/Title 24, LID, and the City's Energy and Climate Action Plan requirements for design components and energy conservation measures during the permitting process for each site-specific development project permitted by the TOD Plans.
Policy 7.2: Encourage the use of alternative energy sources.	Consistent. The CALGREEN/Title 24 and LID standards, and the City's Energy and Climate Action Plan requirements for design components and energy conservation measures that include solar-reflective roofing materials, solar panels, and incorporation of skylights, etc. would encourage the use of alternative energy sources.
Policy 7.3: Encourage the development or rehabilitation of housing that eases use of alternative modes of transportation.	Consistent. As described above, the proposed TOD Plans provide for development and redevelopment of housing near two Metro Stations and would install additional pedestrian and bicycle circulation facilities that would encourage the use of alternative modes of transportation.
Environmental Justice Element	
Governance	
Policy EJ-1.1: Ensure that all City activities are conducted in a fair, predictable, and transparent manner.	Consistent. Workshops were held on 1/10/2017, 3/9/2017, 6/29/2017 and posted on website prior. Public hearings will have notice posted as required by municipal code in local newspaper and mailed to property owners within the TOD area.
Policy EJ-1.2: Provide for clear development standards, rules, and procedures consistent with the General Plan and the City's vision for its future.	Consistent. Both TOD Plans contain Provide for clear development standards, rules, and procedures. As demonstrated in this Table, the TOD Plans are consistent with the General Plan and the City's vision for its future
Policy EJ-1.3: Conduct open meetings on issues affecting land use and the environment.	Consistent. Workshops were held on 1/10/2017, 3/9/2017, 6/29/2017 and posted on website prior. Public hearings will be held before the Planning Commission and City Council on the TOD plans.
Policy EJ-1.4: Proactively engage the community in planning decisions that affect their health and well-being.	Consistent. A scoping meeting was held on 11/14/2016. An outreach event (intercept surveys) was conducted on 12/12/2016. Workshops were held on 1/10/2017, 3/9/2017, 6/29/2017. These meetings were posted on the website prior to conducting the meetings.
Policy EJ-1.5: Prioritize decisions that provide long-term community benefits.	Consistent. The TOD Plans are each designed to provide for short and long-term redevelopment of area within ½ mile radius around the

Relevant Inglewood General Plan Policies	Consistency with General Plan Policies
	<p>station based on identified opportunities and community benefits to be achieved for each community.</p> <p>Certification of this EIR and adoption of the TOD Plans will streamline the environmental review process for future site-specific development and infrastructure improvement projects.</p>
Participation and Collaboration	
<p>Policy EJ-1.9: Promote capacity-building efforts to educate and involve traditionally underrepresented populations in the public decision-making process.</p>	<p>Consistent. Workshops/outreach events for the TOD Plans were held on 11/14/2016, 12/12/2016, 1/10/2017, 3/9/2017 6/29/2017 were hosted at local church (Faithful Central), a veterans’ supportive housing community (U.S. Vets), a local shopping center (Airport Plaza), and donut shop (Randy’s Donuts).</p>
<p>Policy EJ-1.10: Be aware of, and take measures to address, cultural considerations affecting involvement in the public realm.</p>	<p>Consistent. The project website can be translated into multiple languages. Public hearing notices are printed in Spanish and English. Spanish language translation was provided at every community meeting. Members of the consultant and City team are fluent in Spanish.</p>
<p>Policy EJ-1.11: Conduct broad outreach on public hearings that affect the environment in languages used by the community.</p>	<p>Consistent. Meeting notices for workshops were printed in Spanish and English. And will also be printed in Spanish and English for public hearings. Spanish language translation provided at every community meeting. Members of the consultant and City team are fluent in Spanish.</p>
<p>Policy EJ-1.12: Inform the public on decisions that affect their environment using multiple communication methods, including traditional and online forms of communication.</p>	<p>Consistent. The City has conducted extensive outreach via in-person meetings, email, social media (Facebook and Instagram), a project website, workshops, and will also conduct public hearings.</p>
<p>Policy EJ-1.13: Provide written notices and other announcements regarding key land use and development issues in English and Spanish where feasible. For all other materials, note that verbal translation assistance is available.</p>	<p>Consistent. The City has conducted extensive outreach via in-person meetings, email, social media (Facebook and Instagram), a project website, workshops, and will also conduct public hearings. Notices for public meetings were published in English and Spanish. Language translation has been offered at every outreach event for the TOD Plans and will be offered at its public hearings.</p>
<p>Policy EJ-1.14: Offer interpretation services at key meetings and workshops on issues affecting the environment</p>	<p>Consistent. Language translation has been offered at every outreach event for the TOD Plans and will be offered at its public hearings.</p>
<p>Policy EJ-1.15: Consider offering childcare at key meetings and workshops on environmental issues affecting entire neighborhoods and the City as a whole.</p>	<p>Consistent. The City considered providing childcare at during outreach events for the TOD Plans. Although childcare was ultimately not provided at these events, outreach events were attended by several children.</p>
<p>Policy EJ-1.16: Consider varying the time and date of key meetings and workshops, or holding multiple meetings and workshops, in order to ensure broad participation.</p>	<p>Consistent. A scoping meeting, an outreach event, and three (3) community workshops were held. These meetings were hosted at 3:00 pm for the primarily commercial Westchester/Veterans TOD Plan area and at 6:00 pm for the primarily residential neighborhoods within the Crenshaw/Imperial TOD Plan area. Additionally, ad hoc outreach conducted during the day at commercial sites within the Westchester/Veterans TOD Plan area.</p>
<p>Policy EJ-1.17: Seek feedback on public decisions through traditional and online forms of communication, such as website, email, mobile phone apps, online forums, and podcasts.</p>	<p>Consistent. In addition to a scoping meeting for the TOD Plans EIR, an outreach event and three (3) community workshops were held for each of the TOD Plans. The project website contains a “Contact Us” section and email addresses for staff. Information about the TOD Plans was also posted on social media (Facebook and Instagram).</p>

Relevant Inglewood General Plan Policies	Consistency with General Plan Policies
<p>Policy EJ-1.18: Partner with community-based organizations that have relationships, trust, and cultural competency with target communities to outreach on local initiatives and issues.</p>	<p>Consistent. Community workshops for the Westchester/Veterans TOD Plans were held at a church and supportive living community for veterans in the Plan area. Outreach events were also hosted at a shopping center and donut shop in the Plan area.</p> <p>Community workshops and outreach events for the Crenshaw/Imperial TOD Plan were held at a local school.</p> <p>The stakeholder committee for each TOD Plan includes representatives from community-based organizations.</p>
General Environmental Health	
<p>Policy EJ-2.1: Incorporate compliance with state and federal environmental regulations in project approvals.</p>	<p>Consistent. The TOD Plans are undergoing a thorough environmental analysis pursuant to CEQA requirements. As documented in this EIR, site-specific development and infrastructure projects will comply with all applicable local, state, and federal environmental regulations and EIR mitigation measures.</p>
<p>Policy EJ-2.2: Work with other agencies to minimize exposure to air pollution and other hazards in the environment.</p>	<p>Consistent. As part of the preparation and review of this EIR process, outside agency outreach and feedback collection is being conducted.</p>
<p>Policy EJ-2.3: Ensure compliance with rules regarding remediation of contaminated sites prior to occupancy of new development.</p>	<p>Consistent. The TOD Plans are undergoing a thorough environmental analysis pursuant to CEQA requirements. As documented in this EIR, site-specific development and infrastructure projects will comply with all applicable local, state, and federal environmental regulations and EIR mitigation measures.</p>
<p>Policy EJ-2.4: Create land use patterns and public amenities that encourage people to walk, bicycle and use public transit.</p>	<p>Consistent. The TOD Plans are designed to provide high-intensity mixed-use development in proximity to Metro light rail transit stations and enhance access to those stations to encourage transit use.</p> <p>The TOD Plans provide for a network of amenities: plazas, public/private open spaces, parks, paseos, and a complete streets concept to enhance the pedestrian and cycling experience and thereby encourage people to walk and bicycle. As demonstrated in Section 3.7, <i>Transportation</i>, the TOD Plans will result in a substantial reduction of per service population vehicle miles traveled as compared to existing conditions.</p> <p>Each TOD Plan also identifies a potential “park-once concept” parking structure and surface parking locations in the Airport Campus and Station macro form plan areas. Additionally, the plan also proposes corridor activation to encourage multi-modal transportation.</p>
<p>Policy EJ-2.5: Concentrate medium to high density residential development in mixed-use and commercial zones that can be served by transit</p>	<p>Consistent. The Westchester/Veteran’s TOD Plan proposes medium to high density residential development where residential within walking distance of a Metro light rail transit stop. Mixed use zones (MU-1 and MU-C) have been established that are located (1) south and southeast of the Westchester/Veteran’s transit stop and (2) along through fares currently served by at grade public transit.</p> <p>The Crenshaw/Imperial TOD Plan proposes medium to high density residential development within walking distance of a Metro light rail transit stop. A Mixed-Use Corridor (MU-C) and a Mixed-Use Overlay (MU-1A) are proposed on C-2 and R-3 properties located (1) north and northwest of the Crenshaw/Imperial transit stop and (2) along throughfares served by at-grade public transit.</p>
<p>Policy EJ-2.6: Ensure that zoning and other development regulations require adequate</p>	<p>Consistent. The TOD Plans do not propose any new industrial use and would result in conversion of some industrial development to other, land</p>

Relevant Inglewood General Plan Policies	Consistency with General Plan Policies
buffering between residential and industrial land uses.	uses that are complementary to surrounding uses. Properties in the MU-1 Overlay north of Manchester Boulevard within the Westchester/Veterans TOD Plan area would benefit from clear development standards that create a buffer and/or seamless integration from the MU-A properties (Arts Cluster) in the center. Similarly, properties in the MU-1 Overlay zone south of Manchester would benefit from clear development standards that create a southern buffer from existing M-1 zoned properties. There are no areas zoned or planned for industrial use in the Crenshaw/Imperial TOD Plan area.
Policy EJ-2.8: Encourage new development to reduce vehicle miles traveled to reduce pollutant emissions.	Consistent. The TOD Plans are designed to provide high-intensity mixed-use development in proximity to Metro light rail transit stations and enhance access to those stations to encourage transit use. The TOD Plans provide for a network of amenities: plazas, public/private open spaces, parks, paseos, and a complete streets concept to enhance the pedestrian and cycling experience and thereby encourage people to walk and bicycle. As demonstrated in Section 3.7, <i>Transportation</i> , the TOD Plans will result in a substantial reduction of per service population vehicle miles traveled as compared to existing conditions. Each TOD Plan also identifies a potential “park-once concept” parking structure and surface parking locations in the Airport Campus and Station macro form plan areas. Additionally, the plan also proposes corridor activation to encourage multi-modal transportation.
Policy EJ-2.12: Place adequate conditions on large construction projects to ensure they do not create noise, dust, or other impacts on the community to the extent feasible.	Consistent. Impacts related to noise, dust, and other impacts on the community that would result from the TOD Plans are analyzed in tis EIR. All feasible mitigation measures are provided to address any significant impacts that might result.
Policy EJ-13: Continue to reduce pollution entering the storm drain system through the incorporation of best management practices.	Consistent. As discussed in Section 3.13, <i>Hydrology and Water Quality</i> , site-specific development and infrastructure improvement projects permitted by the TOD Plans will be required to comply with applicable local, state, and federal requirements, including implementation of best management practices to prevent erosion, siltation, and pollution from entering the storm drain system.
Residential Uses and Other Sensitive Receptors	
Policy EJ-2.15: Ensure that new development with sensitive uses minimizes potential health risks.	Consistent. The TOD Plans are undergoing a thorough environmental analysis pursuant to CEQA requirements. As documented in this EIR, site-specific development and infrastructure projects will comply with all applicable local, state, and federal environmental regulations and EIR mitigation measures. The result is that potential health impacts on sensitive uses within the TOD Plan areas will be minimized.
Policy EJ-2.16: Ensure that new development with sensitive land uses is buffered from stationary sources and mitigated from non-stationary sources of pollution.	Consistent. The TOD Plans are undergoing a thorough environmental analysis pursuant to CEQA requirements. As documented in this EIR, site-specific development and infrastructure projects will comply with all applicable local, state, and federal environmental regulations and EIR mitigation measures. In addition, the TOD Plans provide for appropriate land use patterns and setbacks. The result is that potential health impacts on sensitive uses within the TOD Plan areas will be minimized.
Policy EJ-2.17: Require that proposals for new sensitive land uses minimize exposure to	Consistent. The TOD Plans are undergoing a thorough environmental analysis pursuant to CEQA requirements. As documented in this EIR, site-specific development and infrastructure projects will comply with all

Relevant Inglewood General Plan Policies	Consistency with General Plan Policies
unhealthful air and other toxins through setbacks, barriers, and other measures.	applicable local, state, and federal environmental regulations and EIR mitigation measures. In addition, the TOD Plans propose open spaces/shared green spaces, streetscapes, building design features (e.g., landscaping green roofs, solar panels, stormwater drainage), and parking facility design features (e.g., solar panels, stormwater drainage) to reduce air pollutant emissions and exposure to unhealthful air and other toxins. The TOD Plans provide for appropriate land use patterns and setbacks. The result is that potential health impacts on sensitive uses within the TOD Plan areas will be minimized.
Policy EJ-2.18: Work with the Inglewood Unified School District to minimize environmental hazards in and around educational facilities.	Consistent. IUSD was included in the stakeholder group for each of the TOD Plans.
Industrial and Commercial Facilities	
Policy EJ-2.20: Work with significant stationary pollutant generators to minimize the generation of pollution through all available technologies.	Consistent. The TOD Plans are undergoing a thorough environmental analysis pursuant to CEQA requirements. As documented in this EIR, site-specific development and infrastructure projects will comply with all applicable local, state, and federal environmental regulations and EIR mitigation measures. As a result, the generation of pollution from uses permitted by the TOD Plans will be minimized through implementation of best management practices and available technologies.
Policy EJ-2.21: Work with significant stationary pollutant generators to minimize the generation of pollution through all available technologies.	
Policy EJ-2.22: Work with industry to reduce emissions through the use of all available technologies.	
Policy EJ-2.23: Work with companies that generate stationary source emissions to relocate or incorporate measures and techniques to reduce emissions.	
Policy EJ-2.26: Ensure that truck-dependent commercial and industrial uses incorporate the latest technologies to reduce diesel emissions.	
Access and Connectivity	
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.	Consistent. The TOD Plans provide for shared and dedicated bike lanes, pedestrian crossing improvements, sidewalks separated from the roadway with tree-planted landscaping, and a series of pedestrian paseos. The Crenshaw/Imperial TOD Plan also provides for a wrap-around bike path/walkway called the "Ring Open Space." Together, these improvements will support increased walking and bicycling within the TOD Plan areas.
Policy EJ-3.2: Facilitate pedestrian and bicycle access to parks and open space through infrastructure investments and improvements.	
Policy EJ-3.4: Require the provision of on-site bicycle facilities in new large-scale development projects.	Consistent. High intensity development permitted within the TOD Plan areas will be required to provide onsite bicycle parking facilities.
Policy EJ-3.6: Provide safe, interesting, and convenient environments for pedestrians and bicyclists, including inviting and adequately lit streetscapes, networks of trails, paths and parks and open spaces located near residences, to	Consistent. The TOD Plans provide for shared and dedicated bike lanes, pedestrian crossing improvements, sidewalks separated from the roadway with tree-planted landscaping, and a series of pedestrian paseos. The Crenshaw/Imperial TOD Plan also provides for a wrap-around bike path/walkway called the "Ring Open Space." Together,

Relevant Inglewood General Plan Policies	Consistency with General Plan Policies
encourage regular exercise and reduce vehicular emissions.	these improvements will support increased walking and bicycling within the TOD Plan areas
Policy EJ-3.7: Encourage new specific plans and development projects be designed to promote pedestrian movement through direct, safe, and pleasant routes that connect destinations inside and outside the plan or project area.	
Policy EJ-3.8: Support implementation of the City's Active Transportation Plan to create a network of safe, accessible, and appealing pedestrian and bicycle facilities and environments.	
Policy EJ-3.9: Employ appropriate traffic calming measures in areas where pedestrian travel is desirable but is unappealing due to traffic conditions.	
Urban Greening	
Policy EJ-4.1: Address whether zoning allows providers of fresh produce (grocery stores, farmers markets, produce stands) to locate within three-quarters of a mile of all residences in the City.	Consistent. Zoning for the TOD Plans permits providers of fresh produce (grocery stores, farmers markets, produce stands) to locate within one-half mile of all residences within and adjacent to the TOD Plan areas.
Policy EJ-4.2: Encourage the development of healthy food establishments in areas with a high concentration of fast-food establishments, convenience stores, and liquor stores. For example, through updated Zoning regulations, tailor use requirements to encourage quality, sit down restaurants, in areas that lack them.	Consistent. Zoning for the TOD Plans provides for establishment of healthy food establishments and quality sit down restaurants within one-half mile of all residences within and adjacent to the TOD Plan areas.
Policy EJ-4.4: Maximize multimodal access to fresh food by encouraging grocery stores, healthy corner stores, and outdoor markets at key transit nodes and within new transit-oriented development projects.	Consistent. Zoning for the TOD Plans permits providers of fresh produce (grocery stores, farmers markets, produce stands) to locate within one-half mile of the Westchester/Veterans and Crenshaw/Imperial Metro light rail stations.
Policy EJ-4.5: Allow farmers' markets to operate in the City where appropriate.	Consistent. Zoning for the TOD Plans permits farmers markets and produce stands to locate within one-half mile of all residences within and adjacent to the TOD Plan areas.
Urban Agriculture	
Policy EJ-4.11: Encourage and simplify the process of developing community gardens within or adjacent to neighborhoods and housing development sites.	Consistent. Both TOD Plans include urban agriculture and community gardens as a permitted use. In conjunction with adoption of the TOD Plans, modifications to the City's residential development standards will include allowance of a private community vegetable garden space to meet common open space requirements within multi-family development.
Policy EJ-4.12: Through updated zoning regulations, allow community gardens as an amenity in required open space areas of new multifamily and mixed-use development projects.	

Relevant Inglewood General Plan Policies	Consistency with General Plan Policies
Policy EJ-4.13: Explore opportunities for community-supported agriculture within the community.	
Policy EJ-4.15: Facilitate the installation of community gardens at senior centers, particularly those that provide meals to seniors.	
Housing Affordability and Displacement	
Policy EJ-5.11: Promote equitable transit-oriented development that includes both affordable and market rate housing.	Consistent. The TOD Plans provide for a net increase of 4,090 dwelling units of market rate and affordable housing within one-half mile of Metro light rail transit stations.
Policy EJ-4.12: Support the development of housing to meet the needs of large households.	Consistent. The TOD Plans provide for a net increase of 4,090 dwelling units of market rate and affordable housing with a variety of unit sizes.
<p>Policy EJ-5.14: Study and assess the efficacy of a variety of additional anti-displacement strategies, and implement selected strategies, to maintain and increase the availability of affordable housing:</p> <ul style="list-style-type: none"> • No net loss of affordable housing (within one-half mile of Metro Light Rail Stations – both income-restricted and existing affordable housing based on 2020 Inglewood rental levels). • Developments dedicated to affordable and workforce housing, including limited-equity housing cooperatives, community land trusts, nonprofit-run housing, or city-owned lands that provide affordable housing. 	Consistent. The TOD Plans provide for a net increase of 4,090 dwelling units of market rate and affordable housing within one-half mile of Metro light rail transit stations. City staff will monitor redevelopment activities to ensure there would be no net loss of affordable housing, either income-restricted or existing affordable housing based on 2020 Inglewood rental levels within the TOD Plan areas.
Public Facilities	
Policy EJ-6.2: Prioritize the City’s capital improvement program to address the needs of disadvantaged communities.	Consistent. The entire City is defined as a disadvantaged community based on the State’s CalEnviroScreen 3.0 model.
Policy EJ-6.4: Provide a park system that provides all residents with access to parks, community centers, sports fields, trails, and other amenities.	Consistent. Both TOD Plans for an open space and park system within one-half mile of all residences within and adjacent to the TOD Plan areas.
Policy EJ-6.5: Acquire additional property for active recreational activities (e.g., sports fields, tracks) for use by Inglewood residents.	Consistent. Both TOD Plans for an open space and park system within one-half mile of all residences within and adjacent to the TOD Plan areas. The Westchester/Veterans TOD Plan proposes creation of a new park (Florence/Ash) which includes recreational activities. The Crenshaw/Imperial TOD Plan proposes a publicly accessible “Ring Open Space” for active recreational opportunities.
Policy EJ-6.7: Require that new development pays all applicable development fees to ensure it pays its fair share of public facilities and service costs.	Consistent. New development permitted by the TOD Plans will be required to pay its fair share of public facilities and service costs.

Relevant Inglewood General Plan Policies	Consistency with General Plan Policies
Policy EJ-6.8: Ensure that new public facilities are well designed, energy efficient and compatible with adjacent land uses.	Consistent. New public facilities within the TOD Plan areas will be subject to all applicable development requirements and environmental mitigation measures.
Policy EJ-10: Coordinate with the Inglewood Unified School District, transit agencies and other public agencies to provide adequate public facilities, improvements, and programs to the City of Inglewood.	Consistent. The development of the TOD Plans was coordinated with LA Metro. In addition, this EIR provides an analysis of impacts on school facilities and provides for mitigation in full of those impacts pursuant to state law.
Noise Element	
<p>Policy 4.2: Incorporate noise considerations into land use planning decisions.</p> <ul style="list-style-type: none"> • Ensure acceptable noise levels near schools, hospitals, convalescent homes, and other noise sensitive uses. • Encourage acoustical design in new construction. 	Consistent. As described in Section 3.10, <i>Noise and Vibration</i> , the proposed TOD Plans would not result in land use-related noise impacts. Site-specific development projects permitted by the proposed TOD Plans would comply with the City's Noise Ordinance, which requires specific noise levels near noise sensitive uses. Similarly, the acoustical design in new construction would be required to meet the City's noise requirements, which are based on Title 24 noise requirements that allow a maximum inside noise level of 45 dBA.
Safety Element	
<p>Policy 1: Provide measures to reduce seismic impacts.</p> <ul style="list-style-type: none"> • Ensure that all potentially hazardous buildings are reinforced or demolished. • Restrict new structures for human occupancy from being constructed across active faults. <p>Require geological and soils engineering investigations in high-risk fault areas.</p>	Consistent. As described in Section 3.13, <i>Geology, Soils and Seismicity</i> , new developments permitted by the proposed TOD Plans would be required to conform to the provisions of the California Building Council (CBC), which are reviewed by the City for appropriate inclusion, as part of the building plan check and development review process. Compliance with the requirements of the CBC and Inglewood Municipal Code for structural safety would reduce seismic related hazards. Thus, the TOD Plans provide measures to reduce seismic impacts.
<p>Policy 4.3: Develop measures to control non-transportation noise impacts.</p> <ul style="list-style-type: none"> • Evaluate noise generated by construction activities. 	Consistent. As described in Section 3.10, <i>Noise and Vibration</i> , the TOD Plans provide for land use compatibility that would control non-transportation noise impacts on sensitive uses. In addition, noise related to construction of site-specific development projects that would be permitted by the proposed TOD Plans are evaluated in Section 3.10, <i>Noise and Vibration</i> .
<p>Policy 4.4: Reduce noise conflicts at the source.</p>	Consistent. As described in Section 3.10, <i>Noise and Vibration</i> , the proposed TOD Plans would not result in land use-related noise impacts. Site-specific development projects would be required to comply with the City's Noise Ordinance, which requires specific noise levels near noise sensitive uses. Similarly, the acoustical design in new construction would be required to meet the City's noise requirements, which are based on Title 24 noise requirements that allow a maximum inside noise level of 45 dBA. Thus, noise conflicts would be reduced at the source.
<p>Policy 4.5: Reduce noise conflicts at the receiver.</p> <ul style="list-style-type: none"> • Encourage a long-term development pattern, which minimizes noise conflicts through planning and zoning. 	Consistent. As described in 3.10, <i>Noise and Vibration</i> , the TOD Plans provides for land use compatibility that would reduce noise conflicts by having low volume noise uses near noise sensitive uses or by providing appropriate acoustical insulation to reduce noise from adjacent high-volume noise generating uses. Thus, noise conflicts would be reduced at the receiver.

Significance Conclusion for Impact LUP-2

Because proposed development is consistent with regional policies, as well as with the Inglewood General Plan, as described above and identified in **Tables 3.3-3** and **3.3-4**, no impact would result, and no mitigation measures are required.

3.3.6 REFERENCES – LAND USE AND PLANNING POLICY

City of Inglewood General Plan: Accessed on March 16, 2021.

http://www.cityofinglewood.org/depts/economic_n_community_development/planning/general_plan.asp

City of Inglewood Zoning Code: Accessed on March 16, 2021.

http://www.cityofinglewood.org/depts/economic_n_community_development/planning/zoning_code.asp

County of Los Angeles General Plan Significant Ecological Areas and Coastal Resource Areas Policy Map, Figure 9.3 (County 2018). Accessed October 3, 2018, 2018.

file:///C:/Users/send/Desktop/Inglewood/Library/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf

Southern California Association of Governments (SCAG), *Connect SoCal, The 2020 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments*, September 3, 2020. Accessed on February 16, 2021. [Connect SoCal - Southern California Association of Governments](#)

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The Arroyo Group, *Westchester/Veterans Station Area Transit Oriented Development Plan and Design Guidelines*, July 2017.

The Arroyo Group, *Crenshaw/Imperial Transit Oriented Development Plan and Design Guidelines*, July 2017.

U.S. Department of Transportation Federal Transit Administration and Los Angeles County Metropolitan Transportation Authority, *Crenshaw Transit Corridor Project Draft Environmental Impact Statement / Draft Environmental Impact Report*, September 2009.

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3.4 POPULATION, HOUSING, AND EMPLOYMENT

3.4.1 INTRODUCTION

a. Overview

Direct evaluation of population, housing, and employment typically involves economic and social issues, rather than physical environmental effects. While the economic or social effects of a project are not considered to be significant environmental effects, CEQA Guidelines Section 15161(a) recognizes that economic or social changes resulting from a project could be “part of a chain of cause and effect leading to physical changes in the environment.” As stated in State CEQA Guidelines Section 15064 (3):

“Economic and social changes resulting from a project shall not be treated as significant effects on the environment. Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment. Where a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project.”

The inclusion of population and housing questions in the CEQA Appendix G checklist recognizes that economic and social effects – substantial unplanned growth, displacing substantial numbers of people or housing – could lead to physical environmental effects. Thus, analysis of population, housing, and employment growth in this section of the EIR focuses on such growth as a potential precursor to the physical environmental impacts addressed in other sections of this document.

Increases in population and employment that would result from proposed transit-oriented development would be physically manifested in the form of housing, commercial, office, and other types of development, resulting in the construction and long-term post-construction impacts addressed in other sections of this EIR. In addition, the relative balance between the number of jobs and amount of housing in a given area affects vehicle miles traveled and associated emissions of air pollutants and greenhouse gases (GHGs), as well as energy consumption related to vehicular travel.

This section therefore describes existing and projected population, housing, and employment characteristics of the Westchester/Veterans and Crenshaw/Imperial areas and the City of Inglewood and examines ways in which proposed transit-oriented development might induce substantial unplanned population growth either directly or indirectly or displace existing housing or people, thereby causing one or more physical environmental effects.

b. Definitions

Affordable Housing under state statutes, refers to housing that costs no more than 30 percent of gross household income. Housing costs include rent or mortgage payments, utilities, taxes, insurance, homeowner association fees, and other related costs.

California Department of Housing and Community Development (HCD) is the state agency responsible for administering state sponsored housing programs and for reviewing city and county housing elements to determine compliance with state housing law.

Household refers to an occupied dwelling unit, including all persons living in the dwelling unit, whether or not they are related. Both a single person living in an apartment and a family living in a house are considered households.

Housing Unit or Dwelling Unit is a room or group of rooms designed to be occupied by one or more individuals living separately from others, containing private toilet and kitchen facilities, and having direct access to the outside or to a public hallway.

Jobs-Housing ratio is a general measure of the “balance” between the number of jobs and number of housing units within a geographic area, without regard to economic constraints or individual preferences. The ratio expresses quantitatively the relationship between the number of people working and number of dwelling units housing the people living in a given area.

Market Balance means a reasonable level of housing vacancies that avoids a local housing shortage and provides for appropriate price competition and consumer choice.

Regional Housing Needs Assessment (RHNA) is a state-mandated process for determining how many housing units, including affordable units, each community must plan to accommodate to provide housing for all economic segments of the community. The Southern California Association of Governments (SCAG) is responsible for working with the State of California Department of Housing and Community Development to determine the amount of housing needed within the region. SCAG allocates regional total housing needs among city and county jurisdictions within the Southern California area. Allocations are based on factors that consider existing employment, employment growth, household growth, and the availability of transit; need is determined for households in all income categories from very-low to above-moderate. Specific allocations are defined for very-low, low, moderate, and above-moderate income groups, which are defined as:

- **Very Low Income:** Household income less than 50% of the County median income.
- **Low Income:** Household income between 51 and 80% of the County median income.
- **Moderate Income:** Household income between 81 and 120% of the County median income.

- **Above Moderate Income:** Household income greater than 120% of the County median income.

Southern California Association of Governments (SCAG) is the regional planning agency for the six-county Southern California area. Among other responsibilities for transportation and environmental quality planning, SCAG is responsible for preparing the Regional Housing Needs Assessment, and responsible for preparation of the regional Sustainable Communities Strategy.

3.4.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

The proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans are subject to a range of regional and local plans, policies, and regulations, which are described below.

a. State Plans, Policies, and Regulations

Senate Bill 375

Adopted into law in 2008, Senate Bill (SB) 375¹ links regional transportation and housing planning with state greenhouse reduction goals. The law requires the California Air Resources Board to establish, for each region of the state, greenhouse gas (GHG) reduction targets for the automobile and light truck sector and requires the regional transportation plan for each region to include a Sustainable Communities Strategy (SCS) to achieve its GHG reduction target.

The law assigns responsibility for developing the SCS for Southern California to SCAG. The SCS must identify the general location of uses, residential densities, and building intensities in the region and identify areas within the region that will house all of the region's population, including all economic segments of the population, considering migration into the region and population growth, over the next eight and 25 years. SB 375 requires regional Sustainable Communities Strategies to forecast development patterns that, when integrated with the region's transportation system, achieves statewide GHG reduction targets.

State of California Housing Element Requirements

California Housing Element Law (Government Code Section 65580, et seq.) requires cities and counties to include, as part of their general plans, a housing element to address housing

¹ SB 375 amended California Government Code Sections 65080, 654000, 65583, 65584.01, 65584.02, 65584.04, 65587, and 65588; added Government Code Sections 14522.1, 14522.2, and 65080.01; amended Public Resources Code (PRC) Section 21063; and added PRC Section 21159.28 and Chapter 4.2 (commencing with Section 21155) to Division 13 of the PRC relating to environmental quality. (PRC) Section 21063; and added PRC Section 21159.28 and Chapter 4.2 (commencing with Section 21155) to Division 13 of the PRC relating to environmental quality.

conditions and needs in the community. The housing element law requires the California Department of Housing and Community Development, in consultation with each regional council of governments, to determine each region's existing and projected housing need. The regional council of governments in turn develops a regional housing allocation plan that distributes the need for new housing for all economic segments of the region to the cities and counties within the region. Allocations are based on factors that consider existing employment, employment growth, household growth, and the availability of transit; need is determined for households in all income categories from very-low to above-moderate (SCAG, 2012). Cities and counties are required to plan for their allocated number of housing units within the housing elements of their general plans. Housing elements are required to be updated every eight years, following timetables adopted by the state. Each agency's housing element must identify and analyze existing and projected housing needs and "make adequate provision for the existing and projected needs of all economic segments of the community," among other requirements.

b. Regional Plans, Policies, and Regulations

Southern California Association of Governments (SCAG)

SCAG is the federally designated "Metropolitan Planning Organization" for the six-county Southern California region, which consists of Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial counties. SCAG is responsible for developing regional plans for transportation, growth management, and hazardous waste management, as well as for developing a regional growth forecast that is the foundation for these plans and for the regional air quality plan developed by the South Coast Air Quality Management District (SCAQMD). SCAG prepares several plans to address regional growth, including the Regional Comprehensive Plan and Guide, the Southern California Compass Growth Vision, the Regional Housing Needs Assessment, the Regional Transportation Plan (RTP), the Regional Transportation Implementation Plan (RTIP), and annual State of the Region reports to measure progress toward achieving regional planning goals and objectives.

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted "Connect SoCal," the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Connect SoCal integrates transportation planning with economic development and sustainability planning to comply with state greenhouse gas (GHG) emissions reduction goals, such as Senate Bill 375.

Southern California will grow from 9 million people, 6 million households, and 8 million jobs in 2020 to 22.5 million people, 7.6 million households, and 10 million jobs in 2045. During that

time, transportation infrastructure will need to substantially expand while also meeting the GHG emissions-reduction targets set by the California Air Resources Board.

SCAG is empowered by state law to assess regional housing needs and provide a specific allocation of housing needs for all economic segments of the community for each of the region's counties and cities. The determination of each city's and county's share of regional housing needs that is required by law to be reflected in municipal General Plan housing elements is based on the growth projections of the RTP/SCS.

Connect SoCal projects that Inglewood will grow from a population of 114,300 in 2020 to 137,100 people in 2045. Between 2020 and 2045, Connect SoCal projects that the number of households in Inglewood will grow from 37,500 to 47,700, while local employment opportunities will increase from 33,800 to 45,900.

Regional Housing Needs Assessment

State law requires that jurisdictions provide their fair share of regional housing needs. HCD is mandated to determine the state-wide housing need. In cooperation with HCD, local governments and councils of governments (COGs) are charged with determining existing and projected housing need as a share of the state-wide housing need of their city or region.

The RHNA is an assessment process performed periodically as part of housing element and general plan updates at the local level. The RHNA quantifies the housing need by income group within each jurisdiction during specific planning periods. The RHNA identifies the existing and future housing need among income categories, for each city and county in the region. Each city and county must ensure that their current zoning regulations and inventory of land available for the development of housing allow for those units to be built. The RHNA does not stipulate that the units be built, only that the land be available and the appropriate zoning regulations are in place.

The sixth cycle RHNA Allocation Plan covers the planning period from October 2021 to October 2029 and indicates the following housing needs for the 2021-2029 period:

- Housing Construction Needed: 7,422 dwelling units
- Housing Construction Needed by Income Group:
 - Very Low Income: 1,808 dwelling units
 - Low Income: 952 dwelling units
 - Moderate Income: 1,110 dwelling units
 - Above Moderate Income: 3,552 dwelling units

c. Local Plans, Policies, and Regulations

City of Inglewood General Plan

The City of Inglewood General Plan includes the following goals and policies that are relevant to the proposed TOD Plans.

Housing Element

The current Inglewood General Plan Housing Element was adopted on January 28, 2014 and was certified as complying with applicable requirements by the California Department of Housing and Community Development on May 20, 2014. The Housing Element sets forth goals, policies, and programs to address the City's existing and projected need for housing in the community in terms of affordability, availability, adequacy, and accessibility, pursuant to state law. The goals and supporting policies in the Housing Element that are relevant to the proposed TOD Plan include the following:

Goal 1: Promote the construction of new housing and new housing opportunities.

Policy 1.1: Provide adequate sites for all types of housing.

Policy 1.3: Further streamline the permit approval process.

Goal 3: Encourage the production and preservation of housing for all income categories, particularly around high-quality transit, including workers in the City that provide goods and services.

Policy 3.5: Encourage the construction of mixed income housing developments that provide housing for a variety of income levels such as extremely low-income up through and including market rate.

Policy 3.6: Provide development incentives for the construction of affordable housing.

Policy 3.7: Explore targeting new housing development opportunities in close proximity to high quality transit.

Goal 7: Encourage Energy Efficiency and Greenhouse Gas Reductions.

Policy 7.1 Facilitate residential energy efficient construction and upgrades.

Policy 7.2 Encourage the use of alternative energy sources.

Policy 7.3 Encourage the development or rehabilitation of housing that eases use of alternative modes of transportation.

3.4.3 ENVIRONMENTAL SETTING

a. Local and Regional Population and Housing

According to California Department of Finance estimates, Los Angeles County, one of the largest counties in the nation, had a population of 10,283,729 in 2018, increasing by 465,124 people from 2010 (4.74 percent) (as shown in **Table 3.4-1**). Housing in the County included approximately 3,546,853 dwelling units in 2018, which increased by 103,766 units (3.40 percent) in the eight years between 2010 and 2018.

In comparison, the City of Inglewood had a population of 113,559 in 2018, which accounts for 1.1 percent of the total County population, and has remained stable since 2000, as shown in **Table 3.4-1**. Likewise, the City's housing stock has remained stable since 2000.

TABLE 3.4-1: LOS ANGELES COUNTY, INGLEWOOD POPULATION AND HOUSING GROWTH TRENDS

	1990	2000	2010	2018	% Change (1990 – 2000)	% Change (2000 – 2010)	% Change (2010 – 2018)
County of Los Angeles							
Population	8,863,052	9,519,330	9,818,605	10,283,729	7.40%	3.14%	4.74%
Housing	3,163,310	3,270,906	3,443,087	3,546,853	3.40%	5.26%	3.01%
City of Inglewood							
Population	109,602	112,580	109,673	113,559	2.71%	-2.65%	3.54%
Housing	38,713	38,648	38,429	38,655	-2.75%	-0.57%	0.59%

Source: U.S. Census: 1990, 2000, 2010; California, Department of Finance, E-5 Population and Housing Estimates 2018, May 2018.

Vacancy rates and affordability of the housing stock are also key elements in the balance between supply and demand in a housing market. High vacancy rates usually indicate low demand and/or high prices in the market. High vacancy rates could also indicate a mismatch between the types of housing and costs that are desired and those that are actually available in the local housing market. Conversely, low vacancy rates usually indicate high demand and/or low prices in the housing market. Generally, vacancy rates ranging from 1 to 3 percent for single-family units and from 3 to 5 percent for multi-family units indicate a reasonable level of vacancies to avoid local housing shortages, along with reasonable levels of price competition and consumer choice. In August 2020, the Southern California Association of Governments reported that out of the total housing units in Inglewood, there are 37,020 occupied units, which equates to a 4.3% total vacancy rate (SCAG 2020). This generally indicates a reasonable balance between housing supply and demand.

Household sizes are also indicative of the balance between supply and demand in the housing market. High persons per household rates in areas with smaller residential units generally

indicates high demand and/or high prices in the housing market. Small households (1 to 2 persons per household typically reside in units with two bedrooms or less, and family households (3 to 4 persons per household) normally reside in units with three to four bedrooms. Large households (5 persons per household or more) typically reside in units with four bedrooms or more. In reality, the relationship between household size and the size of a dwelling unit may also be influenced by cultural and individual preferences. In 2018, both the County of Los Angeles and the City of Inglewood had an average of 3.03 persons per household, which is also generally indicative of a balanced housing market.

b. Regional and Local Employment

Connect SoCal reported there were 4,838,000 jobs in Los Angeles County in 2020. This is approximately 535,700 more than the 4,302,300 jobs that existed ten years earlier in 2010, and 412,000 more than existed in 2000 (EDD, 2016). The 2014 American Community Survey estimates that 92.6 percent of residents within Los Angeles County work within the County, and that 82.9 percent of County residents take an automobile to work while 10.6 percent take public transportation, walk, or bicycle to work.

In comparison, the City of Inglewood includes approximately 33,800 jobs, which has remained steady, consistent with the population and housing trends described above (SCAG, 2020). The majority (66.8 percent) of jobs in the City of Inglewood are blue collar (manual and service) jobs. Of these jobs, the medical and social assistance industry had the highest percentage of jobs (14.4 percent) followed by retail (13.4 percent), and transportation and warehousing (10.2 percent). Of the jobs within the City, 12.8 percent are considered white collar (professional and managerial). By comparison, 52.0 percent of jobs in Los Angeles County are blue collar, and 26.2 percent white collar (Hoffman, 2015).

The 2014 American Community Survey estimates that 83.6 percent of Inglewood residents take an automobile to work, and 11.8 percent take public transportation, walk, or bicycle to work. The mean travel time for City residents to commute is 29 minutes, which is slightly less than the County's mean travel time of 29.6 minutes. In addition, 93.3 percent of workers that live in Inglewood are employed outside of the City, and 89.5 percent of the jobs within the City are held by people that reside outside of the City and commute in.

While most Inglewood residents in the labor force are employed in blue collar jobs (50.9 percent), which represent the majority of jobs within the City, only 6.7 percent of employed Inglewood residents work within the City. Of the blue-collar jobs within the City, health care and social assistance (11.5 percent), retail (11.1 percent), and other services (10.2 percent) are the largest segments of employment. White collar jobs are only held by 7.1 percent of the resident labor force within Inglewood. By comparison, 26.1 percent of Los Angeles County residents have white collar jobs (Hoffman, 2015).

c. Regional and Local Population, Housing, Employment

SCAG produces socioeconomic projections for Southern California, which are used to develop planning documents, such as the Sustainable Communities Strategy/Regional Transportation Plan, South Coast Air Quality Management Plan, and Regional Housing Plan. As shown in **Table 3.4-2**, SCAG projects that the County of Los Angeles' population will increase by 22.32 percent and the number of households will increase by 23.96 percent between 2020 and 2045. The City of Inglewood's population is projected to increase at a slower rate. The City's population is anticipated to increase by 13.49 percent and the number of households by 18.24 percent.

SCAG's employment forecasts indicate that Inglewood's employment base will grow at a faster rate than that of the County (**Table 3.4-2**). Countywide employment is anticipated to increase by 21.00 percent between 2020 and 2045, while the City of Inglewood's employment base is anticipated to increase by 31.90 over that same time period. The net effect is that Inglewood's employment to housing ratio will increase from 0.86 to 0.96 between 2000 and 2045 but will remain below the countywide ratio which is expected to drop from 1.42 in 2000 to 1.38 in 2045.

TABLE 3.4-2: GROWTH PROJECTIONS FOR LOS ANGELES COUNTY AND INGLEWOOD

	2000	2035	2045	% Change (2000– 2045)
County of Los Angeles				
Population	9,544,000	11,174,000	11,674,000	22.32%
Households	3,134,000	3,749,000	3,885,000	23.96%
Employment	4,448,000	5,172,000	5,382,000	21.00%
Employment to Households Ratio	1.42	1.38	1.38	--
City of Inglewood				
Population	120,800	--	137,100	13.49%
Households	40,400	--	47,700	18.24%
Employment	34,800	--	45,900	31.90%
Employment to Households Ratio	0.86	--	0.96	--

Source: SCAG 2016 Growth Forecast by Jurisdiction.

c. Population and Employment within the Westchester/Veterans and Crenshaw/Imperial TOD Plan Areas

Westchester/Veterans TOD Plan Area

In 2016, the Westchester/Veterans TOD Plan area had an estimated population of about 4,620 persons with about 1,590 households, which was about 4.0 percent of the City's estimated total population and households. The population per household within the Westchester/Veterans

TOD Plan was about 2.91, which is less than that of the City (3.04). The large majority of the TOD Plan area's population resides east of the I-405 freeway.

The majority of housing units in the TOD Plan area (about 52 percent) are within Medium Density multi-family structures (2-19 dwelling units in the structure), with the next highest distribution in Single Family structures (about 30 percent), followed by High Density structures having 20 or more dwelling units in the structure (about 18 percent). About 30 percent of the total households are owner-occupied and about 70 percent of the total households are renter occupied.

Crenshaw/Imperial TOD Plan Area

In 2016, the Crenshaw/Imperial TOD Plan area had an estimated population of about 1,980 persons with about 620 households, which was about 2.0 percent of the City's estimated total population and households. The population per household within the Crenshaw/Imperial TOD Plan was about 3.21, which is greater than that of the City (3.04).

The majority of housing units in the TOD Plan area (about 52 percent) are within Single Family structures (about 77 percent), with about 19 percent of the TOD Plan area's housing within Medium Density multi-family structures (2-19 dwelling units in the structure). About 62 percent of the total households are owner-occupied, with about 38 percent of households being renter occupied.

3.4.4 SIGNIFICANCE CRITERIA

Criteria outlined in CEQA Guidelines were used to determine the level of significance of population and housing impacts. Appendix G of state CEQA Guidelines indicates that a project would have a significant effect if it were to:

- POP-1 Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure); or
 - POP-2 Displace substantial numbers of housing units or people, necessitating the construction of replacement housing elsewhere.
-

3.4.5 IMPACTS AND MITIGATION MEASURES

Threshold POP-1: Induce substantial unplanned population growth.

Impact POP-1: Development permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would generate population and employment growth as the direct result of new transit-oriented residential, commercial, and industrial development within the Westchester/ Veterans and Crenshaw/ Imperial areas and indirectly by creating a need for housing for new employees within the TOD Plan areas. The Westchester/ Veterans and Crenshaw/Imperial TOD Plans together propose a greater amount of housing and resulting population than SCAG has projected for Inglewood in Connect SoCal. The employment growth that would result from the proposed TOD Plans do not, however, exceed the employment growth SCAG has projected for Inglewood through 2045. For purposes of analyzing Impact POP-1, the TOD Plans are therefore considered to result in unplanned population growth and planned employment growth. However, the proposed TOD Plans are consistent with the regional policies upon which the projections and regional sustainable communities strategy are based. In addition, due to the TOD Plan's location adjacent to major transit stops, no significant unavoidable impacts would result from the population, housing, and employment growth permitted by the TOD Plans. Impact POP-1 would therefore be *less than significant*.

Methodology

CEQA Guidelines Section 15064(e) states that a social or economic change generally is not considered a significant effect on the environment unless the changes can be directly linked to a physical adverse change. As a result, Threshold POP-1 involves a four-step analysis.

- The direct socioeconomic effects of the TOD Plans are identified in relation to the population, housing, and employment increases that would occur based on the number of residents and employees anticipated at buildout.
- The scale of population and employment that would result from the TOD Plans are then compared with the anticipated the population and employment growth projected by SCAG's Connect SoCal for the City of Inglewood. Any population or employment

growth exceeding Connect SoCal projections for the City of Inglewood would be considered to be “unplanned growth.”

- The potential for the TOD Plans to generate indirect population or employment growth as the result of removing an existing obstacle to growth or by stimulating economic activity such that additional housing, businesses, or services would be needed to support the new economic activity is examined. Any such indirect population or employment growth would be considered to be “unplanned growth.”
 - **Removal of Obstacles to Growth.** Provision of infrastructure in an area where inadequate access or inadequate water, sewer, drainage, or other facilities limit the area’s development potential would remove a physical obstacle to population and employment growth in a manner inconsistent with the City’s General Plan. Should development of the TOD Plans remove physical obstacles that would encourage development in excess of applicable General Plan policies and RHNA needs, such additional growth would be considered to be *unplanned*.
 - **Stimulating Economic Activity.** Increased increase in economic activity in the form of investment and spending by project residents, employees, and businesses can induce growth outside of a project site as the result of:
 - Demand created by project site residents for new retail and service commercial uses in addition to those offered within the project site; or
 - Demand created by project site employees and businesses for housing in addition to that which is offered within the project site.

Should the TOD Plans stimulate economic growth that would encourage development in excess of applicable General Plan policies, such additional growth would be considered to be *unplanned*.

If any significant unavoidable impacts identified in this EIR would be caused by or associated with unplanned growth generated by the TOD Plans, a significant impact in relation with Impact SOC-1 would be identified.

Impact Assessment

Do the Westchester/ Veterans and Crenshaw/Imperial TOD Plans represent “unplanned growth?”

Resident Population Growth

New housing development permitted by the proposed TOD Plans is projected to generate a net increase of approximately 4,090 residential units (1,106 in Westchester/Veterans and 2,984 in Crenshaw/Imperial) and would result in population growth as it provides new homes in the area. As shown in **Table 3.4-3**, build out of the proposed TOD Plans would result in a net population increase of 11,289 persons (3,053 in Westchester/Veterans and 8,236 in Crenshaw/Imperial).

SCAG estimates that by 2045, the City of Inglewood would have a total population of 137,100, representing an increase of 16,300 residents over the City’s estimated 2020 population of 120,800. Buildout of the proposed TOD Plans represents 69.3 percent of the City’s projected population increase through 2045. Together with the population increases that would result from the approved Downtown Inglewood and Fairview Heights TOD Plans (6,415), the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans, Connect SoCal population growth projections would be exceeded. The Westchester/Veterans and Crenshaw/Imperial TOD Plans would, therefore, be considered to cause unplanned growth².

The City’s existing Housing Element, adopted in 2014 for the 5th Cycle planning period (2013-2021), indicated a realistic development capacity of 3,661 dwelling units, which was sufficient for the City’s identified share of regional housing needs for that planning period (1,013 dwelling units from 2013 to 2021). As indicated above, for the 6th Cycle planning period (2021-2029), Inglewood’s share of regional housing needs has increased to 7,422 dwelling units, approximately twice the City’s 2014 realistic development capacity.

The TOD Plans’ net total increase of approximately 4,090 residential units (1,106 in Westchester/Veterans and 2,984 in Crenshaw/Imperial), along with the net increase of 2,693 net increase in dwelling units proposed within the Downtown and Fairview Heights TOD Plans, would increase Inglewood’s residential development capacity by 6,783 dwelling units to a total of 10,444 units, which provides a “cushion” of 3,022 dwelling units above the City’s 2021-2029 need for 7,422 new dwelling units. Given the anticipated 20-year buildouts for the Downtown, Fairview Heights, Westchester/Veterans and Crenshaw/Imperial TOD Plans, only a portion of the net increase of 6,783 dwelling units from the four TOD Plans would be

² See Also Chapter 5 for a discussion of the growth inducing effects of the TOD Plans.

TABLE 3.4-3: ANTICIPATED POPULATION, HOUSING, AND EMPLOYMENT AT BUILD OUT

	RESIDENTIAL (units)	POPULATION	NON- RESIDENTIAL (s.f.)	JOBS
Westchester/Veterans				
Existing Development	1,596	4,617	5,008,003	7,217
Future Demolition/Loss	37	102	465,087	772
Future Construction	1,143	3,155	1,412,676	6,297
Development at Buildout	2,702	7,670	5,955,592	12,742
Net Change	1,106	3,053	947,589	5,525
Crenshaw/Imperial				
Existing Development	1,044	3,281	920,259	3,578
Future Demolition/Loss	83	229	663,432	858
Future Construction	3,067	8,465	421,810	1,017
Development at Buildout	4,028	11,517	678,638	3,737
Net Change	2,984	8,236	-241,621	159
TOD Plans Total				
Existing Development	2,640	7,898	5,928,262	10,795
Future Demolition/Loss	120	331	1,128,519	1,630
Future Construction	4,210	11,620	1,834,486	7,314
Development at Buildout	6,730	19,187	6,634,229	16,479
Net Change	4,090	11,289	705,968	5,684

Source: The Arroyo Group, 2018.

constructed within the 2021-2029 housing planning period. Thus, while the increased residential development capacity provided by the Westchester/ Veterans and Crenshaw/Imperial TOD Plans are defined as “unplanned growth,” this increased capacity is also necessary if the City is to meet its fair share of regional housing need and adopt an adequate Housing element for the 2021-2029 6th Cycle. In addition, the projected remaining 3,022 dwelling unit development capacity in the Year 2029 appears reasonable for housing needs in the 2030’s and beyond.

As noted in Section 3.3, *Land Use and Planning Policy*, land use and patterns and growth that facilitates transit and active transportation (pedestrian and bicycle use) is a goal of the Southern California regional sustainable communities strategy. Inglewood’s proposed and approved TOD Plans are a direct response to this goal. Because SCAG’s population, housing, and employment forecasts are based on regional, subregional, and local socioeconomic forecasts over time, which are in turn based on anticipated market trends, they do not specifically account for currently proposed or probable future development projects. The most likely result of the Westchester/Veterans and Crenshaw/Imperial TOD Plans in relation to regional growth forecasts would be to increase the overall concentration of already forecasted regional growth in

transit-oriented locations, rather than add population growth beyond current regional projections.

Employment Growth

The proposed TOD Plans are projected to generate a net increase of approximately 5,684 jobs within the Westchester/Veterans and Crenshaw/Imperial areas, which would occur incrementally over the anticipated 20-year build out of the TOD Plans. Connect SoCal, however, projects a net increase of 14,100 jobs citywide.

Buildout of the proposed TOD Plans represents 40.3 percent of the City's projected employment growth through 2045. Together with the employment increases that would result from the approved Downtown Inglewood and Fairview Heights TOD Plans (5,640), the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans, Connect SoCal population growth projections would represent 80.3 percent of the employment growth projected for Inglewood through 2045. The Westchester/Veterans and Crenshaw/Imperial TOD Plans would, therefore, be considered to cause *planned* rather than *unplanned* growth.

Based on proposed zoning requirements, most of the new jobs that would be created by the TOD Plans would be retail, commercial, or light industrial related positions that do not require a specialized workforce. Thus, it is anticipated that these jobs would be filled by people who would already be living within Inglewood and other nearby communities and would not induce an unanticipated influx of new labor into the region. The net increase in available housing proposed in the TOD Plans could also accommodate any new workers in the area.

A ratio of 1.46 new jobs per new household would be generated from build out of the TOD Plans. The City currently has a jobs-to-housing ratio of 0.86, which is projected by SCAG to increase to 0.96 in 2045. In comparison, Los Angeles County's current jobs-to-housing ratio of 1.42 is projected by SCAG to drop to 1.38 in 2045. Thus, build out of the TOD Plans would result in an improvement in the jobs-to-household ratio, which is a benefit reflected in the TOD Plans' low per capita vehicle miles traveled and GHG emissions. Improving Inglewood's jobs-to-household ratio is also an objective of the proposed plans.

Construction of site-specific development projects that would occur within the TOD Plan areas would include a need for construction labor. Due to the employment patterns of construction workers in Southern California, and the market for construction labor, construction workers are not likely, to relocate their households as a consequence of the job opportunities presented by future site-specific development projects permitted by the TOD Plans. The construction industry differs from most other industry sectors in several important ways that are relevant to potential impacts on housing:

- There is no specific, regular place of work. Construction workers commute to job sites that change many times in the course of a year. These often-lengthy daily commutes are made possible by the off-peak starting and ending times of the typical construction workday.
- Many construction workers are specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills.
- The work requirements of most construction projects are also specialized, and workers are employed on a job site only as long as their skills are needed to complete a particular phase of the construction process.

It is reasonable to assume that construction workers at site-specific development projects permitted by the TOD Plans would be drawn from the existing labor force in the surrounding area, and, because a typical construction worker would be employed at several different construction sites during any given year, would not relocate their households' places of residence as a consequence of working at a particular construction site within the Westchester/Veterans and Crenshaw/Imperial areas.

Would any significant unavoidable impacts be caused by or associated with unplanned population and/or employment growth generated by the TOD Plans?

As demonstrated by the environmental analyses undertaken for this EIR, no significant unavoidable impacts would result from the population, housing, and employment growth permitted by the TOD Plans.

Significance Conclusion for Impact POP-1

Because the Westchester/Veterans and Crenshaw/Imperial TOD Plans would exceed the population projections set forth in Connect SoCal, housing and population growth generated by the TOD Plans would be unplanned. However, the proposed TOD Plans are consistent with the regional policies upon which the projections and regional sustainable communities strategy are based. The Westchester/Veterans and Crenshaw/Imperial TOD Plans would not exceed the employment projections set forth in Connect SoCal and employment growth would be considered to be planned.

In addition, the 20-year buildout of the TOD Plans would provide needed housing opportunities to meet the City's share of regional housing needs for the 6th Cycle Regional Housing Needs Allocation and future cycles. As demonstrated in the other section of this Chapter, the population and employment growth that would be generated by the TOD Plans would not cause or be associated with any significant unavoidable impacts. Impact POP-1 would therefore be less than significant, and no mitigation would be required.

Threshold POP-2	Displace housing or people, necessitating the construction of replacement housing elsewhere.
Impact POP-2:	Development permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would displace approximately 120 existing dwelling units and 331 people. However, because (1) the City's existing housing vacancy rate provides ample housing opportunities for displaced residents in the short-term and (2) the TOD Plans would result in a net increase in available housing of 4,090 dwelling units, a <i>less than significant impact</i> would result.

Methodology

Housing displacement impacts are based on an analysis of the number and location of dwelling units that are anticipated to be demolished and developed as part of the proposed TOD Plans. As described above, social or economic changes are not considered a significant effect on the environment unless such changes can be directly linked to a physical adverse effect. Therefore, impacts related to housing displacement are considered to be significant if (1) the displacement results in the need for construction of replacement housing and (2) such replacement housing would cause a significant physical change to the environment.

Impact Assessment

As described above, (1) vacancy rates and affordability of the housing stock are also key elements in the balance between supply and demand in the housing market, and (2) a balanced market typically has vacancy rates that range from 1 to 3 percent for single-family units and from 3 to 5 percent for multi-family units. Inglewood's vacancy rate in 2018 was 4.2 percent, which indicates a reasonable balance between market demand and supply.

The proposed TOD Plans would result in demolition of up to 120 dwelling units and displacement of up to 331 residents over the 20+ year buildout of the TOD Plans. According to the California Department of Finance, there were 1,637 vacant dwelling units within the City of Inglewood in 2018. Even if no new housing were to be developed within either TOD Plan area, a loss of 120 dwelling units would result in the City's vacancy rate dropping from 4.2 percent to 3.9 percent, which would still indicate a balanced housing market. However, the TOD Plans provide for development of 4,210 dwelling units (4,090 net increase). Thus, adequate housing opportunities are available in the existing housing market for residents of the units to be demolished and planned development within the TOD Plan areas would be available to fill the needs of residents that would be displaced by future site-specific development projects within the Westchester/Veterans and Crenshaw/Imperial areas. Demolition of existing housing and

displacement of residents caused by the TOD Plans would not result in the need for construction of replacement housing above the amount of housing already proposed by the TOD Plans.

Significance Conclusion for Impact POP-2

Development permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would displace approximately 120 existing dwelling units and 331 people. However, because (1) the City's existing housing vacancy rate provides ample housing opportunities for displaced residents in the short-term and (2) the TOD Plans would result in a net increase in available housing of 4,090 dwelling units, a less than significant impact would result.

3.4.6 REFERENCES - POPULATION, HOUSING, AND EMPLOYMENT

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3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

3.5.1 INTRODUCTION

a. Overview

This section describes existing cultural (historic architectural, as well as prehistoric- and historic-period archaeological) resources, and Tribal Cultural resources, and analyzes impacts associated with the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans on these resources. This section also addresses the potential for encountering human remains outside of formal cemeteries.

b. Definitions

Archaeological Resources include any material remains of human life or activities that are at least 100 years of age and that are of scientific interest. A unique or significant 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 (1) contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information; (2) has a special and particular quality, such as being the oldest of its type or the best available example of its type; and (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

Before Present (BP) is a time scale used to specify when events in the past occurred. BP, when placed after a number (as in 2,500 BP), means “years before the present.” This terminology is used to refer to dates that were obtained through the radiocarbon dating method.

Cultural Resources are defined as buildings, sites, structures, or objects, each of which may have historic, architectural, archaeological, cultural, or scientific importance, according to CEQA.

Historic Building or Historic Site is one that is noteworthy for its significance in local, state, or national history or culture, its architecture or design, or its works of art, memorabilia, or artifacts.

Historic Context refers to the broad patterns of historical development in a community or its region that are represented by cultural resources. A historic context statement is organized by themes such as economic, residential, and commercial development.

Historic District means a geographical area or neighborhood containing a collection of residential and/or commercial historical buildings that generally represents a significant aspect of the community’s architectural and/or development history.

Historic Integrity is defined as “the ability of a property to convey its significance.”

Historical Resources are defined as “a resource listed or eligible for listing on the California Register of Historical Resources” (CRHR) (Public Resources Code, Section 5024.1; 14 Code of California Regulations [CCR] 15064.5). Under CEQA Guidelines Section 15064.5(a), the term “historical resources” includes the following:

- A resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code, Section 5024.1).
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript 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 may be considered to be a historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code Section 5024.1) including the following:
 - Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
 - Is associated with the lives of persons important in California’s past;
 - 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
 - Has yielded, or may be likely to yield, information important in prehistory or history.
- The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

Tribal Cultural Resources include 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 of Historical Resources or local registers of historical resources.

3.5.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

The proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans are subject to a range of federal and state plans, policies, and regulations, which are described below.

a. Federal Plans, Policies, and Regulations

The National Historic Preservation Act of 1966 (NHPA) established the National Register of Historic Places (National Register), which is the official register of designated historic places. The National Register is administered by the National Park Service, and includes listings of buildings, structures, sites, objects, and districts that possess historical, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

To be eligible for the National Register, a property must be significant under one or more of the following criteria pursuant to 36 Code of Federal Regulations Part 60:

- A. Properties that are associated with events that have made a significant contribution to the broad patterns of our history;
- B. Properties that are associated with the lives of persons significant in our past;
- C. Properties that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Properties that have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the aforementioned criteria, an eligible property must also possess historic “integrity,” which is “the ability of a property to convey its significance.” The National Register criteria recognize seven qualities that define integrity: location, design, setting, materials, workmanship, feeling, and association.

Structures, sites, buildings, districts, and objects over 50 years of age can be listed in the National Register as significant historical resources. Properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the National Register. Properties listed in or eligible for listing in the National Register are also eligible for listing in the California Register of Historic Resources (described below), and as such, are considered historical resources for CEQA purposes.

b. State Plans, Policies, and Regulations**California Public Resources Code**

Archaeological, paleontological, and historical sites are protected pursuant to a variety of state policies and regulations enumerated under the California Public Resources Code. In addition, cultural and paleontological resources are recognized as non-renewable and therefore receive protection under the California Public Resources Code and CEQA. The following California Public Resources Code sections apply to activities related to the TOD Plans:

- **California Public Resources Code Sections 5079–5079.65** define the functions and duties of the Office of Historic Preservation (OHP). The OHP is responsible for the administration of federal- and state-mandated historic preservation programs in California and the California Heritage Fund.
- **California Public Resources Code Section 5097** provides procedures to be followed in the event of the unexpected discovery of human remains on non-federal land.
 - **Section 5097.5** of the code states as follows: “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, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor. As used in this section, ‘public lands’ means lands owned by, or under the jurisdiction of, the state or any city, county, district, authority or public corporation, or agency thereof.” Consequently, the City of Inglewood is required to comply with Public Resources Code Section 5097.5 because the TOD Plans are within the City’s jurisdiction.
 - **Sections 5097.9–5097.991** provide protection to Native American historical and cultural resources and sacred sites and identify the powers and duties of the Native American Heritage Commission (NAHC). It also requires notification to descendants of discoveries of Native American human remains and provides for treatment and disposition of human remains and associated grave goods.

Senate Bill 18

Senate Bill 18 (SB 18) (California Government Code Section 65352.3) sets forth requirements for local governments to consult with Native American tribes to aid in the protection of traditional tribal cultural places through local land use planning. The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early stage of planning for the purpose of protecting, or mitigating impacts on, cultural places.

The Tribal Consultation Guidelines: Supplement to General Plan Guidelines (OPR 2005) identifies the following contact and notification responsibilities of local governments:

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes (on the contact list maintained by the Native American Heritage Commission [NAHC]) of the opportunity to conduct consultations for the purpose of preserving, or mitigating impacts to, cultural places located on land within the local government's jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation unless a shorter timeframe has been agreed to by the tribe (Government Code Section 65352.3).
- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located within the city or county's jurisdiction. The referral must allow a 45-day comment period (Government Code Section 65352). Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.
- Local government must send a notice of a public hearing, at least 10 days prior to the hearing, to tribes who have filed a written request for such notice (Government Code Section 65092).

Because the proposed TOD Plans include amending the Inglewood General Plan, they are subject to the statutory requirements of SB 18 Tribal Consultation Guidelines. The City contacted the NAHC with the Notice of Preparation for this EIR and informational letters were sent to each tribe identified on the NAHC's list.

Assembly Bill 52

Assembly Bill 52 (AB 52), which became effective in January 2016 as Public Resources Code Section 21080.3.1, established a new requirement under CEQA to consider "tribal cultural values, as well as scientific and archaeological values when determining impacts and mitigation." Tribal cultural resources are defined 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 of Historical Resources or local registers of historical resources.

In addition, AB 52 implemented a new consultation process, in which lead agencies are required to offer Native American tribes that have submitted written requests the opportunity to participate in consultations to protect tribal cultural resources, and that Native American tribes have the opportunity to consult on CEQA documents prior to public circulation of an EIR. Pursuant to AB 52, lead agencies are required to provide formal notice to the tribes requesting

to participate within 14-days of the lead agency's determination that an application package is complete. Tribes have 30-days to respond to request consultation.

In compliance with AB 52, the City has provided formal notification to California Native American tribal representatives identified by the NAHC to offer consultation with interested tribes regarding the proposed Specific Plan. Native American groups may have knowledge about cultural resources in the area and may have concerns about adverse effects from development on tribal cultural resources as defined in Public Resources Code Section 21074. Per the requirements of AB 52:

- A Final EIR, Mitigated Negative Declaration, or Negative Declaration cannot be certified until AB-52 tribal consultation has concluded.
- Agreed upon mitigation measures with a tribe requesting consultation, must be included in the environmental document.

Health and Safety Code Section 7050.5(b)

California Health and Safety Code Section 7050.5(b) specifies protocols when human remains are discovered. Specifically, burials or human remains found inside or outside of a known cemetery are not to be disturbed or removed unless by authority of law, and the area of a discovery of human remains should remain undisturbed until a County coroner is notified and has examined the remains prior to determining the appropriate course of action.

Health and Safety Code Section 7052

Section 7052 of the California Health and Safety Code makes the willful mutilation, disinterment, or removal of human remains a felony. Section 7052.5 requires that any construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If the remains are determined to be Native American, the coroner must contact the NAHC.

3.5.3 ENVIRONMENTAL SETTING

Following is a brief overview of the ethnography and historic background, providing a context in which to understand the background and relevance of potential historic, cultural, and Tribal cultural resources in the TOD Plan areas.

a. Native American Background - The Gabrieliño

The Los Angeles region was traditionally occupied by the Takic-speaking Gabrieliño-Tongva Indians. The term "Gabrieliño" is a general term that refers to those Native Americans who subject to the administration of the Spanish at the Mission San Gabriel Arcángel. Many

contemporary Gabrieliño identify themselves by the name “Tongva.” The Gabrieliño-Tongva 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.

The Gabrieliño-Tongva Indians were hunter-gatherers and lived in permanent communities located near the presence of a stable food supply. Community populations generally ranged from 50 to 100 inhabitants, although larger settlements may have existed. Subsistence consisted of hunting, fishing, and gathering. Small terrestrial game was hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison. The primary plant resources were the acorn, gathered in the fall and processed in mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly-leaved cherry.

Coming ashore on Santa Catalina Island in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrieliño-Tongva; the 1769 expedition of Gaspar de Portolá also passed through Gabrieliño-Tongva territory. Native Americans suffered severe depopulation and their traditional culture was radically altered after Spanish contact. Nonetheless, Gabrieliño-Tongva descendants still reside in the greater Los Angeles area, and maintain an active interest in their heritage.

b. History of Inglewood

The City of Inglewood area was first developed in the 1800s and evolved from agricultural activities to urban development. Before California became a territory of the United States in 1848, a succession of ranchers established the Rancho Aguaje de la Centinela around Centinela Springs, a natural spring that still flows today under Vincent Park. One of these ranchers, Ygnacio Machado, built the Centinela Adobe as the ranch house in 1834. Decades later, in 1885, Daniel Freeman, a Canadian attorney, purchased the rancho, became a partner in the Centinela-Inglewood Land Company, built an office on Centinela Adobe land, and established the town of Inglewood. In addition, the California Central Railroad was developed in 1887, which led to development in the area (City 2006).

The City of Inglewood was incorporated in 1908 and grew substantially in the 1920’s after an earthquake at the beginning of the decade. The aftermath drew people to the City to witness the sight, and many stayed, causing Inglewood to be the fastest growing city in the United States from 1920 to 1925 (City, 2006; 2014). It was in the 20’s that the downtown commercial core began to coalesce on Market Street and what is today La Brea Avenue, and the architecture changed from impermanent structures to architecture consistent with traditional American

Main Streets, built out of brick and hollow tile. In the 1930's, modern styles from Art Deco to Streamline Moderne took preeminence. Many of today's historic structures are from this interwar period. Also, during this period, the eastern part of the Westchester/Veterans planning area (Olive Street and Queen Street residential districts) were built out with small single-family homes.

In 1937, the City of Los Angeles purchased Mines Field (renamed as Los Angeles Airport in 1946). A number of airplane manufacturers and related businesses subsequently located their factories in the Inglewood area, and by the time of America's entry into World War II, Los Angeles had become the nation's center for aircraft industry.

c. Historic Resources

Centinela Adobe

Centinela Adobe is the 1834 ranch house of the Rancho Aguaje de la Centinela. Built by Ignacio Machado, it has been owned by a Civil War General, a Scottish Baronet and Daniel Freeman, founder of Inglewood, whose land office was relocated to the property in the 1880s. It is the oldest building in the area and has been called the "Birthplace of Inglewood." This property is located on 7634 Midfield Avenue and is operated as a museum administered by the City of Inglewood Department of Parks and Recreation. It is a California State Historic Landmark, Landmark and is listed on the National Register of historic places.

The Centinela Adobe is located in the northwest portion of the Westchester/Veterans TOD Plan area. The adobe is landlocked from the rest of the City of Inglewood and can only be accessed through residential neighborhoods within the City of Los Angeles. It is approximately a 10-minute walk from the Westchester/Veterans Metro station.

Randy's Donuts

Randy's Donuts is a 1953 drive-in donut restaurant with a 32-foot high donut on top that has been featured in numerous movies and television shows. The restaurant is located adjacent to the I-405 freeway, forms both a gateway to the western side of the Westchester/Veterans TOD Plan area and is its best-known attraction.

d. AB 52 Tribal Consultation

As part of the AB 52 consultation process for previous projects, five tribes have requested future notification of, with the possibility of providing consultation on, any projects that proceed under CEQA. These tribes include the Gabrieliño-Tongva Tribe, Gabrieliño Tongva Indians of California Tribal Council, Gabrieliño/Tongva Nation, the Gabrieliño/Tongva San Gabriel Band

of Mission Indians, and the Gabrieleño Band of Mission Indians–Kizh Nation. In accordance with AB 52, the City sent notification letters to the five tribes identified above that the City was proposing TOD Plans for the Westchester/Veterans and Crenshaw/Imperial areas.

During tribal consultations for previous projects within Inglewood¹, City staff was provided an overview of the Gabrieleño Band of Mission Indians–Kizh Nation’s experience with other projects in the Los Angeles Basin, including work that the Tribe has completed for LA Metro and other transit efforts. The Tribe noted that artifacts had been unearthed as part of ground disturbing activities for these other projects.

The Tribe also noted that many of these discoveries were the result of transit routes following historic roads and routes in the Los Angeles Basin. They noted that the existing networks of major roadways followed historic and prehistoric trading routes in the area that were used by Native American tribes that resided in the area and along the west coast².

Since the Inglewood area was a land area of confluence, it would likely have been heavily used for human travel, movement of trade items, visiting of family, going to ceremonies, accessing recreation areas, and accessing foraging areas. Further, within and around these routes contained seasonal or permanent ramadas or trade depots, seasonal and permanent habitation areas, and often still contain isolated burials and cremations from Tribal members who died along the trail. These isolated burials are not associated with a village community burial site or ceremonial burial site, rather the location is simply where the person died and was buried where they died. Due to these trading routes and historical activity centers and the tribal tradition of burying their deceased along the routes and near waterways, these activities could result in the TOD Plan areas containing buried tribal cultural resources and human remains.

3.5.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of cultural resources impacts. Appendix G of the CEQA Guidelines indicates that a project would have a significant effect if it were to:

Threshold CUL-1 Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.

¹ Inglewood Transit Connector and the Inglewood Basketball and Entertainment Center.

² During consultation for the Inglewood Transit Connector, the Gabrieleño Band of Mission Indians–Kizh Nation shared information including maps of portions of Inglewood that depict the historic and prehistoric trading routes and suggested mitigation measures to reduce impacts to resources that could be unearthed during ground disturbing activities.

Threshold CUL-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

Threshold CUL-3 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.

Threshold CUL-4 Disturb any human remains, including those interred outside of formal cemeteries.

3.5.5 IMPACTS AND MITIGATION MEASURES

Threshold CUL-1: Cause a substantial adverse change in the significance of a historic resource.

Impact CUL-1: Although no historically significant buildings are planned for demolition and the proposed TOD Plans aim to ensure preservation of existing and potential historic resources, site-specific development projects permitted by the proposed TOD Plans could cause a substantial adverse change in the significance of a historical resource by altering the physical characteristics of an historical resource or those of its physical setting that convey its historical significance. A significant impact would result, requiring mitigation. Implementation of Mitigation Measure CUL-1 would protect those physical characteristics of an historical resource or those of its physical

setting that convey its historical significance. Impact CUL-1 would therefore be *significant but mitigable*.

Methodology

Historic resources are usually 50 years old or older and must meet at least one of the criteria for listing in the California Register (such as association with historical events, important people, or architectural significance), in addition to maintaining a sufficient degree of physical integrity (CEQA Guidelines Section 15064.5(a)(3)).

Additionally, CEQA Guidelines Section 15064.5(b) states that a project that may cause a substantial adverse change in the significance of a historical resource would have a significant effect on the environment. A substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The significance of a historical resource would be materially impaired if a project:

- (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources 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) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Generally, for any historic resource, following the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings would result in a less-than-significant impact.

Analysis of this threshold involved first determining whether any historic resources are located within the TOD Plan areas. Should one or more such resources exist, then the analysis

addressed ways in which the proposed TOD Plans might affect the integrity or setting of each historic resource.

Impact Assessment

The Westchester/Veterans TOD Plan area contains the Centinela Adobe, which is designated as a California State Historic Landmark and listed in the National Register of Historic Places. Although not formally designated as such, Randy's Donuts, a 1953 drive-in donut restaurant that has been featured in numerous movies and television shows, represents a local cultural/historic landmark. In addition, numerous structures throughout both TOD Plan areas are now 50 years of age or more, while other will reach 50 years of age and therefore become potentially historic resources during the 20-year buildout of both TOD Plan areas.

The Westchester/Veterans TOD Plan proposes preserving the Centinela Adobe in its current state; no modifications to the site are proposed. The Centinela Adobe is bounded by the I-405 freeway and existing residential neighborhoods within the City of Los Angeles for which no changes are proposed.

The Westchester/Veterans TOD Plan proposes retention of Randy's Donuts because it "is the most famous location in the planning area, and as such it helps give the planning area identity. For its architectural uniqueness, movie fame, tourist draw and the love it inspires among locals, it is critical that the Randy's Donuts sign not be lost."

Both the Westchester/Veterans and Crenshaw/Imperial TOD Plans preserve existing residential neighborhoods and set forth design guidelines and development requirements to protect these neighborhoods from incompatible uses and provide buffers where higher intensity uses would be developed adjacent to lower intensity residential uses.

Although no historically significant buildings are planned for demolition and the proposed TOD Plans aim to preserve existing and potential historic resources, future site-specific development projects permitted by the TOD Plans could increase development intensity adjacent to an historic resource to a degree that might impair the ability of the resource to convey its historical significance. This would occur should site-specific development adjacent to a known or previously unidentified, potential historical resources (buildings, structures, and features aged 50 years and older) be permitted at such a scale or in such a location or configuration that the historical significance of the resource would no longer be visible or otherwise apparent.

Significance Conclusion for Impact CUL-1

Because future site-specific development projects permitted by the proposed TOD Plans could cause a substantial adverse change in the significance of a historical resource by altering the

physical characteristics of an historical resource or those of physical setting of the resource itself or the adjacent development that convey its historical significance, a significant impact would result, requiring mitigation.

Mitigation Measures

Mitigation Measure CUL-1: Prior to issuance of any permits for projects or demolition activities that would physically affect any listed or potentially eligible historic buildings, structures, or features aged 50 years old or older or negatively affect their historic setting, a cultural resource professional who meets the Secretary of the Interior's Professional Qualifications Standards for Architectural History shall be retained to determine if the proposed activities would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. The investigation shall include, as determined appropriate by the cultural resource professional and City of Inglewood, the appropriate archival research, including, if necessary, a records search at the South-Central Coastal Information Center (SCCIC) of the California Historical Resources Information System (CHRIS) and a pedestrian survey of the proposed project or activity area to determine if any significant historic period resources would be adversely affected by the proposed action. The results of the investigation shall be documented in a technical report or memorandum that identifies and evaluates any historical resources within the project area and includes recommendations and methods for eliminating or reducing impacts on historical resources. Methods would include, but are not limited to, written and photographic recordation of the resource in accordance with the level of Historic American Building Survey (HABS) documentation that is appropriate to the significance (local, state, national) of the resource. Methods determined to reduce historic impacts, pursuant to the Secretary of the Interiors standards to a less than significant level shall be incorporated into all development plans submitted and included as conditions of approval. In addition, a qualified cultural resource professional shall monitor development activities to ensure that recommended site-specific historic related design measures are followed during construction.

Implementation: A qualified cultural resource professional shall be retained to identify potential historic resources on any site-specific development project containing one or more buildings more than 50 years old. Designers and contractors shall comply with the recommended historic design standards and other measures identified by the historic evaluation. In addition, the qualified cultural resource professional shall monitor development activities to ensure that recommended site-specific historic related design measures are followed during construction.

The historic recommendations shall be incorporated into all development plans submitted and included as conditions of approval. The City Planning Division shall review all of the historic assessment reports and the design features of development projects prior to approval of any demolition, grading, or construction permit.

Significance Conclusion for Impact CUL-1 with Implementation of Mitigation Measures

With implementation of the design standards of the proposed TOD Plans and Mitigation Measure CUL-1, protection of those physical characteristics of an historical resource and those of its physical setting that convey its historical significance would be ensured. Impacts related to a substantial adverse change in the significance of a historic resource would therefore be reduced to less than significant.

Threshold CUL-2: Cause a substantial adverse change in the significance of an archaeological resource.

Impact CUL-2: Site-specific development and infrastructure projects permitted by the Westchester/Veterans and Crenshaw/Imperial TOD Plans could result in a substantial adverse change in the significance of a previously unknown subsurface archaeological resource during site preparation and grading activities. However, compliance with existing regulations and implementation of Mitigation Measure CUL-2 would reduce this impact to a less-than-significant level. The impact would therefore be *significant but mitigable*.

Methodology

Archaeology relates to the recovery and study of material evidence of human life and culture of past ages. Because, over time, this material evidence becomes buried, fragmented, or scattered

or otherwise hidden from view, it is not always evident from a field survey of a project site. Thus, the possible presence of archaeological materials is often determined by the presence of geographic, vegetative, and rock features that are known or thought to be associated with early human life and culture, as well as knowledge of events or material evidence in the area.

Pursuant to Public Resource Code Section 21080.3.1 (AB 52), the City of Inglewood contacted the California Native American Tribes identified by the NAHC to offer consultation with the City regarding the potential effect of the proposed TOD Plans. No areas containing sensitive resources within the TOD Plan areas were identified as the result of this request for consultation with Native American Tribes.

The analysis of impacts related to archaeology is based on a review of existing literature and previous studies within Inglewood and nearby areas, and the likelihood of discovering previously unknown subsurface archaeological resources within the TOD Plan areas, recognizing that these areas have been heavily urbanized. The analysis considers the risk of loss of resources that could result from construction and development activities that would be permitted by the proposed TOD Plans. In determining whether a significant impact could result from the proposed TOD Plans, the analysis includes consideration of the potential of the TOD Plan areas to contain unknown subsurface archaeological resources. The proposed TOD Plans would have a significant impact on archaeological resources if future site-specific development activities permitted by the TOD Plans would disturb, damage, or degrade an archaeological resource or an archaeological historic resource defined as being "significant," or by disturbing the contextual setting of such a resource.

Impact Assessment

The TOD Plan areas are located in an urbanized setting, with a limited number of vacant parcels, all of which were previously disturbed by past development activities. While the TOD Plan areas have been previously disturbed and developed, future site-specific development projects permitted by the TOD Plans could involve grading and excavation to greater depths than previously undertaken. In addition, infill development would occur on vacant parcels, some of which may not have been previously exposed to substantial ground disturbing activities, and therefore could result in the disturbance of unknown subsurface archaeological resources.

Furthermore, it is known that the Centinela Valley area contains sites of Native American and early European settlements. Thus, the TOD Plan areas have a likelihood of containing unknown subsurface archaeological resources. Because future site-specific development permitted by the proposed TOD Plans could involve grading and excavation to greater depths than was previously undertaken, such future development could disturb buried subsurface archaeological resources.

Significance Conclusion for Impact CUL-2

Because grading and site preparation activities for site-specific development and infrastructure projects permitted by the TOD Plans could disturb buried subsurface archaeological resources, such disturbance could damage, or degrade an archaeological resource or an archaeological historic resource defined as being “significant.” As a result, Impact CUL-2 would be considered to be significant requiring mitigation.

Mitigation Measure

Mitigation Measure CUL-2: Prior to the issuance of a grading permit and/or action that would permit site disturbance (whichever occurs first), the applicant/ developer shall provide written evidence to the City Planning Division that a qualified archaeologist has been retained to respond on an as-needed basis to address unanticipated archaeological discoveries and any resulting archaeological requirements shall be incorporated into all development plans submitted and also included as conditions of approval. In the event that archaeological materials, including stone tools, shells, bones, glass shards, ceramics, or other materials older than 50 years in age, are encountered during ground-disturbing activities, work in the immediate vicinity of the resource shall cease until a qualified archaeologist has assessed the discovery and appropriate treatment pursuant to CEQA Guidelines Section 15064.5 is determined.

If archaeological resources are found to be significant, the archaeologist shall determine, in consultation with the City and any local Native American groups expressing interest following notification by the City, appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, such as data recovery or other appropriate measures, in consultation with the implementing agency and any local Native American representatives expressing interest in prehistoric or tribal resources. If an archaeological site does not qualify as an historical resource but meets the criteria for a unique

archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2.

Implementation: A qualified archaeologist shall be retained by the applicant/developer to respond on an as-needed basis to address unanticipated archaeological discoveries. In addition, any archaeological requirements established by the archaeologist evaluating the discovery shall be incorporated into all development plans submitted and included as conditions of approval.

Significance Conclusion for Impact CUL-2 with Implementation of Mitigation Measure

Mitigation Measure CUL-2 reduces the potential for archaeological resources to be impacted during earthmoving activities and provides for preservation of any previously unknown resources that may be discovered. With implementation of this mitigation measure, impacts related to a substantial adverse change in the significance of an archaeological resource would be reduced to less than significant.

Threshold CUL-3 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 CUL-3 Because it is known that the Centinela Valley area, including the TOD Plan areas, contains sites of Native American and early European settlements, unknown subsurface Tribal cultural

resources could be present. Thus, it is possible that previously unknown, yet significant, Tribal cultural resources could be encountered below the ground surface during ground disturbance activities. With implementation of Mitigation Measures CUL-2 and CUL-3, this impact would be *significant but mitigable*.

Methodology

The proposed TOD Plans would have a significant impact on a tribal cultural resource, as that term is defined in Public Resources Code Section 21074, if development or other activities permitted by the TOD Plans would disturb, damage, or degrade the tribal cultural resource or its contextual setting resulting in substantial loss of its cultural value.

Impact Assessment

As noted above, the City provided formal notification to California Native American tribal representatives identified by the NAHC to offer consultation with interested tribes regarding the proposed TOD Plans. Any consultation requested by a Tribal entity will be completed prior to certification of the Final EIR for the TOD Plans as required by AB 52.

Construction of site-specific development projects within the TOD Plan areas would include demolition, grubbing, and grading, possible subterranean utility relocation and installation, and building construction.

Because it is known that the Centinela Valley area contains sites of Native American and early European settlements, the TOD Plan areas could contain unknown subsurface Tribal cultural resources. Because future site-specific development permitted by the proposed TOD Plans could involve grading and excavation to greater depths than was previously undertaken, such future development could disturb buried subsurface Tribal cultural resources.

Significance Conclusion for Impact CUL-3

Because grading and site preparation activities for site-specific development and infrastructure projects permitted by the TOD Plans could disturb previously unidentified subsurface Tribal cultural resources, such disturbance could damage, or degrade an archaeological resource or an archaeological historic resource defined as being “significant.” As a result, Impact CUL-3 would be considered to be significant, requiring mitigation.

Mitigation Measures

Mitigation Measure CUL-3: If requested by a Native American Tribe asserting the potential presence of a previously unknown Tribal cultural resource

(Consulting Tribe), a qualified Native American Monitor with the same authority of the archaeologist identified in Mitigation Measure CUL-2 shall be retained by the developer and present onsite during construction-related ground disturbance activities, including but not limited to, pavement removal, pot-holing or auguring, boring, grading, excavation, trenching, and vegetation removal.

Implementation. Should monitoring by a Native American Monitor be required, the Monitor shall be designated by the Consulting Tribe.

If no Native American Monitor is designated within 30 days of notice to the Consulting Tribe of the need for a Monitor, the activity can commence without the designated Monitor. A copy of the executed contract shall be submitted to the City of Inglewood Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity.

The Tribal Monitor shall complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified.

The Tribal monitor will only be present on-site during ground-disturbing activities which include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching.

The on-site monitoring shall end when all ground-disturbing activities on the Project Site are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities at the project site have little to no potential for impacting Tribal Cultural Resources.

Upon discovery of any Tribal Cultural Resource, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist required in Mitigation Measure CUL-2 and Tribal monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner

the Tribe deems appropriate, for educational, cultural and/or historic purposes.

Significance Conclusion for Impact CUL-3

Mitigation Measure CUL-3 reduces the potential for previously unknown tribal cultural resources to be impacted during earthmoving activities and provides for preservation of any previously unknown resources that may be discovered. With implementation of this mitigation measure, impacts related to a substantial adverse change in the significance of a Tribal cultural resource would be reduced to less than significant.

Threshold CUL-4: Disturb any human remains, including those interred outside of formal cemeteries.

Impact CUL-4: Site-specific development projects permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans could disturb previously unknown human remains interred outside of formal cemeteries. However, compliance with existing regulations would ensure that this potential impact would be *less than significant*.

Methodology

The assessment of potential impacts related to human remains consists of a qualitative review of the existing cultural resource conditions and previous land uses within the TOD Plan areas, the potential for human remains to be located within those areas, and a determination of whether there are adequate provisions to ensure protection of human remains, if found during project construction activities. An impact would be considered significant if human remains are disturbed outside of the guidelines of the California Health and Safety Code and the Public Resources Code.

Impact Assessment

The TOD Plan areas has been previously disturbed and developed; however, future site-specific development projects permitted by the TOD Plans could involve grading and excavation to greater depths than was undertaken for previous development. In addition, infill development may occur on some parcels that might not have been previously exposed to ground disturbing activities, and therefore could result in the disturbance of unknown human remains.

In the event of an inadvertent discovery or recognition of any human remains during ground disturbance activities, regulations pursuant to California Health and Safety Code Section 7050.5 would be implemented. These regulations require that if human remains are unearthed during

construction, then no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to Public Resource Code Section 5097.98, which outlines the NAHC notification process and the appropriate procedures if the Coroner determines the human remains to be Native American. Compliance with applicable regulations during development of site-specific project permitted by the TOD Plans would protect unknown and previously unidentified human remains, and impacts related to unknown human remains would be less than significant.

Significance Conclusion for Impact CUL-4

Site-specific development permitted by the Westchester/Veterans and Crenshaw/Imperial TOD Plans would be required to comply with Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. Compliance with these regulations would protect any previously unidentified human remains, and impacts would be less than significant.

3.5.6 REFERENCES - CULTURAL AND TRIBAL CULTURAL RESOURCES

333 North Prairie Avenue Project Initial Study/Mitigated Negative Declaration, (City 2014) City of Inglewood. December 18, 2014

City of Inglewood 2006 General Plan Technical Background Report, 2006.

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The Arroyo Group, *Crenshaw/Imperial Transit Oriented Development Plan and Design Guidelines*, July 2017.

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3.6 TRANSPORTATION

3.6.1 INTRODUCTION

a. Overview

This section analyzes impacts on existing and future transportation systems that would result from the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans. Transportation-related issues of concern that are addressed include vehicle miles travelled, transit, and bicycle and pedestrian movement.

b. Definitions

Bike Lane refers to a corridor expressly reserved by markings for bicycles, existing on a street or roadway in addition to any lanes for use by motorized vehicles (Class 2 Bikeway).

Bike Path refers to a paved route not on a street or roadway and expressly reserved for bicycles. Bike paths may parallel roads but typically are separated from them (Class 1 Bikeway).

Bike Route refers to a facility shared with motorists and identified by signs or pavement marking symbols. A bike route does not have lane stripes (Class 3 Bikeway).

Bus Rapid Transit (BRT) is a bus-based transit system that generally has specialized design, services, and infrastructure to improve system quality and remove the typical causes of delay. BRT aims to combine the capacity and speed of light rail with the flexibility, lower cost, and simplicity of a bus system by providing fully dedicated bus lanes along a significant part of their route. In addition, a BRT system typically has one or more of the following elements:

- Alignment in the center of the road (to avoid typical curb-side delays);
- Stations with off-board fare collection (to reduce boarding and alighting delay related to paying the driver);
 - Station platforms level with the bus floor (to reduce boarding and alighting delay caused by steps); and/or
 - Bus priority at intersections (to avoid intersection signal delay).

Collector refers to a transitional street design that is between arterials and local streets. A collector is typically designed to carry 3,000 to 10,000 vehicles per day with one or more travel lane in each direction.

Major Arterial is a roadway that is typically designed to carry over 30,000 vehicles per day with a minimum of two full-time through lanes in each direction in addition to a separate median lane (raised or painted) to accommodate left turn movements.

Minor Arterial is a roadway that is typically designed to carry 15,000 to 30,000 vehicles per day, with minimum of two travel lanes in each direction. A separate (generally painted) median lane to accommodate left turn movement is desirable if there is sufficient roadway width.

Paratransit consists of an alternative mode of passenger transportation that does not follow fixed routes or schedules and consists typically of vans or minibuses. Paratransit services are operated by public transit agencies, community groups or not-for-profit corporations, and for-profit private companies or operators.

Peak Hour represents the one-hour period between 7:00 and 9:00 AM and 4:00 and 6:00 PM that experiences the heaviest amount of traffic on a given intersection, freeway interchange, or freeway mainline segment.

Right-of-Way refers to any place, which is dedicated to use by the public for pedestrian and vehicular travel. A right-of-way may include, but is not limited to, a street, sidewalk, curb, and gutter. A right-of-way may be a crossing, intersection, parkway, median, highway, alley, lane, mall, court, way, avenue, boulevard, road, roadway, railway, viaduct, subway, tunnel, bridge, thoroughfare, park square, or other similar public way.

Transportation Priority Area is an area located within a one-half mile of an existing or planned “major transit stop” or an existing stop along a “high quality transit corridor.” Per Public Resources Code, § 21064.3, “‘Major transit stop’ means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” Per Public Resources Code, § 21155, a high-quality transit corridor means a “corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.”

Trip refers to a one-way journey that proceeds from an origin to a destination via a single mode of transportation and is the smallest unit of movement considered in transportation studies. Each trip has one “production end” (origin) and one “attraction end” (destination).

Vehicle Miles Traveled (VMT) refers to the average daily number of automobile trips and distance of automobile travel associated with a specified geographic area based on the following formula:

$$\text{Number of trips} \times \text{average distance (in miles) per trip} = \text{vehicle miles traveled (VMT)}$$

3.6.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

The proposed TOD Plans are subject to a range of federal, state, regional, and local plans, policies, and regulations, which are described below.

a. Federal Plans, Policies, and Regulations

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, beginning at Section 12101. Title III prohibits discrimination on the basis of disability in places of public accommodation (i.e., businesses and non-profit agencies that serve the public) and commercial facilities (i.e., other businesses). This regulation includes Appendix A to Part 36, Standards for Accessible Design, which establishes minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warning for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travelway, and a vibration-free zone for pedestrians.

b. State Plans, Policies, and Regulations

Caltrans

Interstate freeways and State Routes are under the jurisdiction of the California Department of Transportation (Caltrans), which sets standards, policies, and strategic plans for the more than 45,000 miles of California's highway and freeway lanes, including the I-105 and I-405 freeways that are adjacent to or run through the planning area. Caltrans administers its services through its six primary programs: Aeronautics, Highway Transportation, Mass Transportation, Transportation Planning, Administration, and the Equipment Service Center. Under the Transportation Planning program, Caltrans runs the State of California's bicycle program. The Bicycle Facilities Unit, acting as Caltrans' bicycle division, provides policy, funding, planning, and technical expertise in bicycle transportation in consultation with federal, state, and local transportation agencies, Caltrans headquarters and district staff, legislative staff, and the public. The Caltrans Highway Design Manual establishes uniform policies and procedures to carry out the highway design functions of Caltrans.

c. Complete Streets Act

The California Complete Streets Act of 2008 (Assembly Bill 1358) requires cities and counties making substantive revisions to the circulation element of their general plans to include modifications to plan for complete streets. The act states: "In order to fulfill the commitment to

reduce greenhouse gas emissions, make the most efficient use of urban land and transportation infrastructure, and improve public health by encouraging physical activity, transportation planners must find innovative ways to reduce vehicle miles traveled (VMT) and to shift from short trips in the automobile to biking, walking and use of public transit.” California Government Code Section 65302(b)(2)(A) requires that, upon any substantial revision of a community’s general plan circulation element, the circulation element must be amended to plan for “a balanced, multimodal transportation network that meets the needs of all users of the streets, roads, and highways for safe and convenient travel in a manner that is suitable to the rural, suburban, or urban context of the general plan.” Subsection B defines “users of streets, roads, and highways” as “bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, users of public transportation, and seniors.”

d. Senate Bill (SB) 743 Revisions to CEQA Guidelines

Adopted in September 2013, SB 743 eliminated traffic congestion as a significant impact under CEQA within designated Transportation Priority Areas and gave the Governor’s Office of Planning and Research (OPR) leeway to eliminate level of service (LOS) from CEQA entirely throughout the State.

CEQA Guidelines were subsequently revised to implement SB 743 and went into effect statewide on July 1, 2020 eliminating LOS and other measures of traffic congestion (often referred to as delay-based metrics) as a physical environmental effect. Current CEQA Guidelines state that a “project’s effect on automobile delay does not constitute a significant environmental impact.”

The basic provisions of CEQA Guidelines implementing SB 743 include:

- Establishing vehicle miles travelled (VMT) as the transportation threshold of significance under CEQA, replacing level of service and other delay-based measures of traffic congestion;
- Applying VMT analysis requirements only to automobile travel and not to heavy truck travel; and
- Presuming that development within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor would cause a less than significant transportation impact.

e. Regional Plan, Policies, and Regulations**SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy**

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted “Connect SoCal,” the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Connect SoCal integrates transportation planning with economic development and sustainability planning to comply with state greenhouse gas (GHG) emissions reduction goals, such as Senate Bill 375. Relevant goals of Connect SoCal include:

Goals

1. Encourage regional economic prosperity and global competitiveness.
2. Improve mobility, accessibility, reliability, and travel safety for people and goods.
3. Enhance the preservation, security, and resilience of the regional transportation system.
4. Increase person and goods movement and travel choices within the transportation system.
5. Reduce greenhouse gas emissions and improve air quality.
6. Support healthy and equitable communities.
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network.
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel.
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options.
10. Promote conservation of natural and agricultural lands and restoration of habitats.

f. Local Plans, Policies, and Regulations**City of Inglewood General Plan Circulation Element**

The General Plan Circulation Element identifies the system of freeways, major and minor arterials, and collector streets needed to carry traffic within and through the community. In addition to the I-405, I-110, and I-105 freeways, the arterial and collector roadways within the Westchester/Veterans and Crenshaw/Imperial areas that are identified in the Circulation Element are described below in Section 3.6.4. The Circulation Element also describes transit services within Inglewood and sets forth a bicycle routes plan that has been incorporated into the proposed TOD Plans.

3.6.3 ENVIRONMENTAL SETTING

a. Vehicular Circulation Network

Freeway Network

The *I-405 (San Diego)* Freeway is a major north-south freeway that runs along the western edge of Inglewood. I-405 connects the San Fernando Valley to Orange County by traversing western Los Angeles County. I-405 through Inglewood varies between four and five lanes in each direction with several sections having auxiliary lanes between successive on- and off-ramps. Access to I-405 from Florence Avenue is provided by an atypical interchange, with only a southbound off-ramp connecting to Florence Avenue at La Cienega Boulevard. La Cienega Boulevard south of Industrial Avenue splits into one-way segments in each direction that cross over I-405 and merge at Florence Avenue. The southbound segment merges with the southbound freeway on- and off-ramps before intersecting Florence Avenue. The northbound segment of La Cienega Boulevard merges with the northbound off-ramp (which begins south of Manchester Boulevard) before intersecting Industrial Avenue.

The *I-105 (Glenn Anderson)* Freeway and Transitway is an east-west freeway that runs along the southern edge of Inglewood. I-105 consists of one HOV lane and three general purpose traffic lanes in each direction. The Metro Green Line light rail transit route is located within the median of the I-105 freeway.

The *I-110 (Harbor)* Freeway is a major north-south freeway that runs approximately two miles east of the City of Inglewood. I-110 connects the San Pedro community to Pasadena through the City of Los Angeles. The I-110 freeway varies from six to eight lanes in each direction with several sections having auxiliary lanes between successive on- and off-ramps. Regional access to the I-110 freeway is provided through the I-105 interchange and Imperial Highway.

Arterial and Collector Roadway Network

A brief description of the major roadways serving the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas is provided below, including discussion of the current General Plan Circulation Element designations for these roadway (e.g., major arterial, minor arterial, collector). It should be noted that specific roadways and roadway segments are not always built-out to their ultimate classification due to right-of-way constraints posed by adjacent land uses and roadway geometrics.

Arbor Vitae Street runs in an east-west orientation from Airport Boulevard to Prairie Avenue and then continues from Crenshaw Boulevard to Van Ness Avenue. Arbor Vitae Street has two travel lanes in each direction from Airport Boulevard to La Brea Avenue, one travel lane in each

direction from La Brea Avenue to Prairie Avenue, and one travel lane and one bike lane in each direction from Crenshaw Boulevard to Van Ness Avenue. On-street parking is intermittently permitted on both sides of the street. The street is divided by a painted median over most of its length. The established speed limit is 35 mph.

Ash Avenue runs in a north-south direction area between Florence Avenue and Hillcrest Boulevard. The street consists of one travel lane in each direction, with on-street parking on both sides. The speed limit is established as 25 mph.

Airport Boulevard runs a north-south orientation between Century Boulevard and La Tijera Boulevard. Airport Boulevard from Century Boulevard to Interceptor Street-Car Rental Agency has two travel lanes in the northbound direction and three travel lanes in the southbound direction, and from Interceptor Street-Car Rental Agency to La Tijera Boulevard has two travel lanes in each direction. Airport Boulevard is divided by a painted median over most of its length. On-street parking is allowed along the northbound travel direction. The established speed limit is 35 mph.

Aviation Boulevard runs in a north-south orientation between Arbor Vitae Street and Manchester Boulevard. Aviation Boulevard consists of two travel lanes in each direction, with on-street parking only along the northbound travel direction. The speed limit is established as 40 mph.

Centinela Avenue runs in a north-south orientation through the TOD Plan areas beginning at Florence Avenue and continuing north through Hyde Park Boulevard, where it curves to the west and runs in an east-west direction through La Cienega Boulevard and continues to the west under I-405. Centinela Avenue is classified as a major arterial in the City's General Plan Circulation Element and consists of two travel lanes in each direction. There is on-street parking on both sides of the street. The speed limit is established as 40 mph.

Century Boulevard is a major arterial that provides access to LAX, car rental companies, I-405, and I-110. It runs in an east-west orientation from SR-1/LAX entrance to east of the I-110 freeway. The number of lanes varies from two to four travel lanes in each direction. The corridor is divided by either a raised or a painted median throughout its length. On-street parking is available on both sides, although it is restricted when travel lanes drop to two lanes and near the LAX. The speed limit varies from 35 mph and 40 mph and is established as 35 mph from SR-1/LAX entrance to Inglewood Avenue, as 40 mph from Inglewood Avenue to Van Ness Avenue, and 35 mph from Van Ness Avenue to I-110.

Crenshaw Boulevard runs in a north-south orientation with three travel lanes in each direction. Crenshaw Boulevard is classified as a major arterial in the City's General Plan Circulation Element. Crenshaw Boulevard provides access to I-105 on the southern edge of Inglewood, and

to the I-10 freeway north of the City. There is on-street parking on both sides of the street within the TOD Plan area. The speed limit is established as 35 mph.

Eucalyptus Avenue lies west of La Brea Avenue and runs in a north-south orientation for the entire length of Inglewood with one travel lane in each direction. Eucalyptus Avenue is classified as a minor arterial in the City's General Plan Circulation Element. There is on-street parking south of Manchester Boulevard, and limited parking in certain segments north of Manchester Boulevard. The speed limit is established as 30 mph.

Fairview Boulevard runs in an east-west orientation, joining Hyde Park Boulevard on the east and La Cienega Boulevard on the west. The portion of the street within the TOD Plan areas is designated as a collector in the City's General Plan Circulation Element. The street consists of one travel lane in each direction, with on-street parking on both sides. The speed limit is established as 25 mph.

Florence Avenue runs in an east-west orientation with two travel lanes in each direction. There is also a bike lane in each direction between Locust Street and Redondo Boulevard. Florence Avenue is classified as a major arterial in the City's General Plan Circulation Element and provides an east-west connection from I-110 through Inglewood to I-405. There is no on-street parking in the TOD Plan area, and Florence Avenue is part of the County's CMP network. The designated speed limit is established as 40 mph.

Hawthorne Boulevard runs in a north-south orientation, beginning at Imperial Highway and terminating at Century Boulevard, with three travel lanes in each direction. The corridor is directionally divided by a raised median. There is a bike lane in each direction between 104th Street and 111th Street. Hawthorne Boulevard is a major arterial that provides access to I-105. On-street parking is permitted on both northbound and southbound directions. The designated speed limit is established as 35 mph.

Hindry Avenue runs in a north-south orientation in the TOD Plan area between Arbor Vitae Street and Florence Avenue. The corridor consists of one travel lane in each direction, with on-street parking on both sides. The speed limit is established as 30 mph.

Hyde Park Boulevard runs in an east-west orientation north of Florence Avenue. It is designated as a collector in the City's General Plan. Hyde Park Boulevard consists of one travel lane in each direction, with on-street parking on both sides. The speed limit is established as 30 mph.

Imperial Highway is a major arterial that runs in an east-west orientation from Sepulveda Boulevard to east of the I-110 freeway. It provides access to LAX; the I-105, I-405, and I-110 freeways; and several major arterials. The corridor mainly consists of three travel lanes in each direction west of Vermont Avenue, though there are portions where it drops to two lanes on

each side. East of Vermont Avenue, there are two travel lanes in each direction. The corridor is directionally divided by either a raised median or a painted median. There is on-street parking on both sides, though it is partially restricted. The speed limit varies from 35 to 45 mph along the corridor. It is established as 45 mph on west of Nash Street, 40 mph from the Nash Avenue to La Cienega Boulevard, 35 mph from La Cienega Boulevard to Yukon Avenue, 40 mph on from Yukon Avenue to Vermont Avenue, and 35 mph on east of Vermont Avenue.

Inglewood Avenue has a north-south orientation and is classified as a collector in the City's General Plan Circulation Element. Inglewood Avenue has one travel lane in each direction and provides on-street parking on both sides.

Juniper Street has an east-west orientation and is classified as a collector in the City's General Plan Circulation Element, connecting Eucalyptus Avenue to La Brea Avenue and Hyde Park Boulevard. The street has one travel lane in each direction and provides on-street parking on both sides.

La Brea Avenue runs in a north-south orientation with two travel lanes in each direction. La Brea Avenue is classified as a major arterial in the City's General Plan Circulation Element and provides the TOD Plan area with access to I-10 and Mid-City and connects to Hawthorne Boulevard and links up to I-105. There is on-street parking on both sides of La Brea Avenue within the TOD Plan area. The speed limit is established as 35 mph.

La Cienega Boulevard runs in a north-south orientation from La Tijera Boulevard to Imperial Highway. It is a major arterial that provides access to the I-405 and I-105 freeways and some major arterials serving the TOD Plan areas including Florence Avenue, Manchester Avenue, Arbor Vitae Street, and Century Boulevard. The corridor consists of three travel lanes in each direction north of Hyde Park Boulevard and two travel lanes in each direction south of Hyde Park Boulevard. There is on-street parking on both sides, which is partially restricted or restricted during a.m. and p.m. peak period. The speed limit is established as 45 mph north of Florence Avenue, 40 mph south of Florence Avenue.

La Tijera Boulevard connects Manchester Avenue to La Cienega Boulevard. La Tijera Boulevard has three travel lanes in each direction and from Manchester Avenue to I-405 Southbound Ramps is divided by either a raised median or painted median. On-street parking on both sides is allowed only from I-405 Northbound Ramps to La Cienega Boulevard. The speed limit is established as 40 mph.

Manchester Boulevard runs in an east- west orientation with two travel lanes in the westward direction and two travel lanes west of Hillcrest Boulevard and three travel lanes east of Hillcrest Boulevard in the eastward direction. Manchester Boulevard is classified as a major arterial in the City's General Plan Circulation Element and provides an east-west connection from I-110 through the heart of Inglewood and continues west to Playa Del Rey. Manchester Boulevard

passes by multiple key locations in the area including the Inglewood Park Cemetery, The Forum, and Inglewood High School. There is on-street parking on both sides of the roadway within the TOD Plan area. Manchester Boulevard is part of the CMP network. The speed limit is established as 35 mph.

Market Street begins east of La Brea Avenue at Florence Avenue, and meets La Brea Avenue further south. Market Street is classified as a minor arterial in the City's General Plan Circulation Element. There is one travel lane in each direction with a median lane to accommodate left turn movements. There is also a mixture of parallel and angled street parking along both sides of the street. The speed limit is established as 25 mph.

Olive Street runs in an east-west orientation between Manchester Boulevard and La Cienega Boulevard and serves as a collector. Olive Street consists of one travel lane in each direction from Manchester Boulevard to Glasgow Avenue, and one travel lane in the westward direction and two travel lanes in the eastward direction from Glasgow Avenue to La Cienega Boulevard. There is on-street parking on both sides except for the eastbound direction with two travel lanes.

Osage Avenue runs in a north-south orientation between Manchester Avenue and La Tijera Boulevard. It serves as a collector. The Avenue has one travel lane in each direction, with on-street parking on both sides. The established speed limit is 30 mph.

Prairie Avenue runs in a north-south orientation. There are two travel lanes in each direction, and it is designated as a major arterial in the City's General Plan Circulation Element. There is no on-street parking available. The speed limit in the TOD Plan area is established as 40 mph.

Sepulveda Boulevard runs in a north-south orientation west of La Tijera Boulevard. It is classified as a major arterial. The boulevard consists of three travel lanes plus one bike lane in each direction. On-street parking is permitted along the northbound travel direction. The speed limit is established as 40 mph.

Western Avenue runs in a north-south orientation from Florence Avenue to Imperial Highway. Western Avenue is a minor arterial and consists of two travel lanes in each direction. There is on-street parking on both sides of the corridor. The speed limit is established as 40 mph on the south of West Park Terrace and 35 mph on the north of West Park Terrace.

Van Ness Avenue runs in a north-south orientation from Imperial Highway to Florence Avenue and is located at the eastern boundary of the City of Inglewood. The corridor has two travel lanes in each direction from Imperial Highway to Century Boulevard and one travel lane in each direction from Century Boulevard to Florence Avenue. From Century Boulevard to 80th Street, the corridor is directionally divided by a painted median serving as a two-way left-turn

lane (TWLTL). There is on-street parking on both sides of the corridor within the TOD Plan area. The designated speed limit is established as 35 mph.

120th Street runs in an east-west orientation from Aviation Boulevard to Van Ness Avenue within the TOD Plan area. It provides access to I-105. The corridor consists of two travel lanes in each direction except for the eastward direction from I-105 ramps to Van Ness Avenue that consists of three travel lanes. There is on-street parking on both sides from Aviation Boulevard to Prairie Avenue. The speed limit is established as 40 mph.

b. Transit

The current transit system serving the TOD Plan areas is currently comprised of bus services provided by the Metropolitan Transportation Authority (Metro), Big Blue Bus (Santa Monica), Beach Cities Transit, and Torrance Transit and the Metro Green Line. The Metro Crenshaw-LAX line is currently under construction with service anticipated to begin in 2022. Transit routes currently serving each study area are described in **Table 3.6-1**.

TABLE 3.6-1: EXISTING TRANSIT SERVICES

Service Agency/ Service Type	Line	From/To	To/From	Peak Hour Frequency (minutes)	
				AM	PM
Westchester/Veterans TOD Plan Area					
Big Blue Bus	3	Aviation Station	Arizona & 5th	20	20
Metro Local	40	South Bay Galleria	Union Station	10-20	10-20
Metro Local	102	LAX City Bus Center	Palm & Seville	35-45	35-40
Beach Cities Transit	109	LAX City Bus Center	Redondo Beach Riviera Village	40-50	40-50
Metro Local	110	E.A. Way & Jefferson	Granger & Florence	10-30	20-30
Metro Local	111	LAX City Bus Center	Norwalk Station	10-30	20-30
Metro Local	115	Vista Del Mar & Culver	Norwalk Station	15-30	20-40
Metro Local	117	LAX City Bus Center	Green Line Station	15-20	15-20
Metro Local	211-215	South Bay Galleria	Redondo Beach Station	35-60	30-50
Metro Local	212-312	Hawthorne/Lennox Station	Hollywood Way/Vine Station	10-25	15-30
Metro Local	217	Los Angeles Jefferson Station	Hollywood Vine Station	15-25	10-15
Metro Local	607	Inglewood Transit Center	Inglewood Transit Center	50-60	50-60
Crenshaw/Imperial TOD Plan Area					
Metro Rail	Green Line	Redondo Beach	Norwalk	6	6

3.6 Transportation

Service Agency/ Service Type	Line	From/To	To/From	Peak Hour Frequency (minutes)	
				AM	PM
Torrance Transit	5	Pacific Coast Hwy at Crenshaw Bl	Crenshaw Station	55-65	55-65
Torrance Transit	10	Crenshaw Bl at Pacific Coast Hwy	Crenshaw Station	25-30	30
Metro Local	40	South Bay Galleria	Union Station	10-20	10-20
Metro Local	115	Vista Del Mar & Culver	Norwalk Station	15-30	20-40
Metro Local	117	LAX City Bus Center	Green Line Station	15-20	15-20
Metro Local	120	Aviation/ LAX Station	Whittwood Town Center	35-40	30-60
Metro Local	126	Manhattan Beach & Valley Drive	Hawthorne Station	65	70
Metro Local	207	Western & Imperial	Hollywood & Western	10-15	10-15
Metro Local	209	Vermont/ Athens Station	Wilshire/ Western Station	50-60	50-60
Metro Local	210	South Bay Galleria	Vine & Hollywood	15-20	20-35
Metro Local	211-215	South Bay Galleria	Redondo Beach Station	35-60	30-50
Metro Local	212-312	Hawthorne/Lennox Station	Hollywood Way/Vine Station	10-25	15-30
Metro Local	442	Hawthorne/Lennox Station	Patsaouras Transit Plaza/Union Station	45	45
Metro Rapid	710	South Bay Galleria	Wilshire/ Western Purple Line Station	10-15	10-20
Metro Rapid	740	South Bay Galleria	Expo/Crenshaw Station	15-20	20
Metro Rapid	757	Crenshaw Green Line Station	Hollywood/Western Station	10-15	10-15

Source: Iteris, 2018

c. Pedestrian and Bicycle Facilities

Existing pedestrian facilities within the TOD Plan areas generally consist of traditional sidewalks and pedestrian street crossings. The existing facilities are typically lacking in pedestrian enhancements such as landscaping, medians, pathways, alleys, and other pedestrian-friendly amenities including shading, furniture, signage, and other comforts.

Currently, there are no formal bicycle facilities in the TOD study areas; however, the City of Inglewood General Plan Circulation Element designates the following streets as Class III bicycle routes:

- Queen Street from Oak Street to City Hall

- Kelso Street from Oak Street to Prairie Avenue
- Arbor Vitae Street from Metro R.O.W, on the west, to Oak Street
- Oak Street from Queen Street to Arbor Vitae Street
- 111th Place from Yukon Avenue to Crenshaw Boulevard
- Yukon Avenue from Century Boulevard to 118th Place

Figure 2-6 illustrates existing and proposed bicycle facilities.

d. Truck Routes

Major north/south truck routes within Inglewood include La Brea Avenue, Centinela Avenue, Eucalyptus Avenue, West Boulevard, and Crenshaw Boulevard. Major east/west routes include Florence Avenue, Hyde Park Boulevard, and Manchester Boulevard.

The City of Inglewood's truck routes as described in the City's Municipal Code Section 3-85 include the following:

- Arbor Vitae Street from West City Limits to La Brea Avenue
- Aviation Boulevard from Manchester Boulevard to South City Limits
- Centinela Avenue from West City Limits to Florence Avenue
- Century Boulevard from West City Limits to East City Limits
- Crenshaw Boulevard from North City Limits to South City Limits
- Eucalyptus Avenue from Florence Avenue to Juniper Street
- Florence Avenue from Manchester Boulevard to East City Limits
- Hawthorne Boulevard from Century Boulevard to South City Limits
- Hyde Park Boulevard from Hyde Park Place to East City Limits
- Hyde Park Place from Centinela Avenue to Hyde Park Boulevard
- Imperial Highway from West City Limits to East City Limits
- Juniper Street from Eucalyptus Avenue to La Brea Avenue
- La Brea Avenue from North City Limits to South City Limits
- La Cienega Boulevard from North City Limits to South City Limits
- Manchester Boulevard from West City Limits to East City Limits
- Prairie Avenue from Florence Avenue to South City Limits
- 102nd Street from Prairie Avenue to Yukon Avenue

3.6.4 SIGNIFICANCE CRITERIA

Criteria outlined in current CEQA Guidelines were used to determine the level of significance of transportation impacts. Appendix G of state CEQA Guidelines indicates that a project would have a significant effect if it were to:

- Threshold TRA-1** Conflict with an applicable program, plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, including transit, roadway, bicycle, and pedestrian facilities?
- Threshold TRA-2** Be inconsistent with CEQA Guidelines Section 15064.3(b).
- Threshold TRA-3** Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- Threshold TRA-4** Result in inadequate emergency access.

3.6.5 IMPACTS AND MITIGATION MEASURES

Threshold TRA-1: Conflict with an applicable program, plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Impact TRA-1: Development permitted by the proposed TOD Plans would provide enhanced bicycle and pedestrian facilities and would also improve access to transit. The resulting impact would be *less than significant*.

Methodology

To determine whether the proposed TOD Plans would result in a significant impact, the extent to which the TOD Plans would provide facilities to enhance the use of public transit, as well as pedestrian and bicycle mobility, was compared to adopted plans for public transit, pedestrian mobility, and bicycle facilities. A significant impact would result if adopted plans would require a greater level of public transit, pedestrian mobility, and bicycle facilities than was being proposed in the TOD Plans.

Impact Assessment

The proposed TOD Plans include extensive improvements to pedestrian and bicycle mobility within the TOD Plan areas, as described in Chapter 2, *Project Description*, would not modify or disrupt any existing bicycle or pedestrian facilities outside the TOD Plan areas. Included in the TOD Plan is not only a map of proposed routes consistent with the City's General Plan bicycle system, but the TOD Plans also provide for facilities such as bicycle parking that would enhance the bicycling environment and maximize bicycle accessibility (e.g., requirements for the inclusion of bicycle parking near all destination points and on roadways with high volumes). The proposed TOD Plans are therefore consistent with the City's adopted General Plan.

In addition to bicycle facilities, the TOD Plans include provisions to improve pedestrian mobility within the TOD Plan areas. By increasing development intensity in the vicinity of two Metro stations and enhancing pedestrian and bicycle access to those stations, the TOD Plans would also increase access to transit.

Significance Conclusion for Impact TRA-1

The TOD Plans provides for pedestrian and bicycle facilities that would improve upon existing General Plan requirements. The TOD Plans are therefore consistent with adopted policies, plans, or ordinances regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities. Impacts would be less than significant.

Threshold TRA-2: Consistency with CEQA Guidelines Section 15064.3(b).

Impact TRA-2: **The mixed-use development proposed for the TOD Plan areas would substantially lower average daily vehicle miles traveled (VMT) per service population within both TOD Plan areas. This due to the location of the Westchester/Veterans and Crenshaw/Imperial areas within one-half mile of major transit stops along the Metro Crenshaw/LAX line and Green line, respectively; improved access to the stations; and improved pedestrian and bicycle facilities provided for in the TOD Plans. Impacts would therefore be *less than significant*.**

Methodology

Pursuant to the requirements of Senate Bill (SB) 743, CEQA Guidelines establish criteria for determining the significance of transportation impacts, replacing delay-based metrics such as LOS and ICU with analysis of vehicle miles travelled (VMT) in CEQA documents. As of July 1,

2020, automobile delay, as measured by “level of service,” “intersection capacity utilization,” and other similar metrics, does not constitute a significant environmental effect under CEQA.

CEQA Guidelines Section 15064.3 (b)(1) states “Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact.”

The Westchester/Veterans and Crenshaw/Imperial TOD Plan area is located within one-half mile of the Westchester/Veterans Metro Station, which is currently under construction along the Crenshaw/LAX Line. In addition, the Crenshaw/Imperial TOD Plan is located within one-half mile of the Crenshaw station along the Metro Green line. Thus, pursuant to CEQA Guidelines Section 15064.3 (b)(1), the TOD Plans “should be presumed to cause a less than significant transportation impact.”

Nevertheless, an analysis was undertaken to determine whether the mix and intensity of uses proposed by the TOD Plans would increase vehicle miles traveled (VMT) on a per service population (area residents plus employees) basis. An increase in per service population VMT caused by the TOD Plans would result in a significant impact.

Impact Assessment

As shown in **Table 3.6-2**, addition of the mixed-use development proposed in the TOD Plan areas has a dramatic effect on VMT, substantially lowering the average daily VMT per service population within both TOD Plan areas. This due to the location of the Westchester/Veterans and Crenshaw/Imperial areas within one-half mile of major transit stops along the Metro Crenshaw/LAX line and Green line, respectively; improved access to the stations; and improved pedestrian and bicycle facilities provided for in the TOD Plans.

TABLE 3.6-2: VEHICLE MILES TRAVELLED

Area	Without TOD Plans	With TOD Plans	Change
Westchester/Veterans			
Daily VMT	614,331	616,270	1,938
Service Population	11,834	20,412	8,578
VMT per service population	51.9	30.2	(21.7)
Crenshaw/Imperial			
Daily VMT	74,143	74,761	618
Service Population	6,859	15,254	8,386
VMT per service population	10.8	4.9	(5.9)
TOD Plan Areas Total			
Daily VMT	688,474	691,030	2,556
Service Population	18,693	35,666	16,973
VMT per service population	36.8	19.4	(17.4)

Source: Iteris, 2018

Threshold TRA-3: Substantial increase in hazards due to geometric design features or incompatible uses.

Impact TRA-3.1: Site-specific development projects permitted by the proposed TOD Plans would generate increased traffic result at freeway off-ramps within and near the TOD Plan areas. Such increased traffic would not result in traffic backing up from off-ramps onto the freeway mainline. Thus, this impact would be *less than significant*.

Methodology

To determine whether existing freeway off-ramps to which the proposed TOD Plans would add traffic are adequately sized to accommodate traffic generated by the TOD Plans without having vehicles exiting freeways back up from freeway off-ramps onto the freeway mainline, a queuing analysis was conducted for 10 off-ramps within and near the TOD Plan areas. The queue lengths were calculated using the Synchro 9 software, which evaluates for 95th percentile queue lengths and compared to available vehicle storage capacity on the off-ramps. A significant impact would occur if traffic from the proposed TOD Plans would cause queuing to back up onto the freeway mainline.

Impact Analysis

An analysis of peak hour queue lengths at the Caltrans off-ramp locations within and near the TOD Plan areas was undertaken for the cumulative with project conditions in the year 2040. The queue lengths are presented for the 95th percentile condition, using the HCM methodology. **Table 3.6-10** summarizes the a.m. and p.m. peak hour 95th percentile queue lengths as well as the current storage capacity on the off-ramps. As shown in **Table 3.6-3**, the 95th percentile queue lengths are anticipated to be accommodated by the off-ramps in the vicinity of the TOD Plans and traffic would not spill back from the off-ramps onto the freeway mainline.

Significance Conclusion for Impact TRA-3.1

Traffic generated from development permitted by the proposed TOD Plans would increase traffic at freeway offramps; however, traffic would not back from an off-ramp onto a freeway mainline. Thus, this impact would be less than significant, and no mitigation is required.

TABLE 3.6-3: FUTURE YEAR 2040 WITH PROJECT FREEWAY OFF-RAMP QUEUE LENGTHS

	Intersection	Movement	Storage Length (ft)*	95 th Percentile Queue Length (ft)		Queue Exceeds Storage Length?
				AM Peak Hour	PM Peak Hour	
4	La Tijera Blvd/I-405 NB Ramps	NB left	750	110	270	No
		NB right		130	320	No
5	La Tijera Blvd/I-405 SB Ramps	SB left/thru/right	1,075	530	490	No
		SB right		510	460	No
18	La Cienega Blvd/I-405 SB Ramps (north of Century Blvd)	WB left/right	1,800	200	440	No
20	La Cienega Blvd/I-405 SB Ramps (south of Century Blvd)	WB right	660	0	10	No
		WB right		0	10	No
22	Ash Ave/I-405 Off Ramp/ Manchester Blvd	NB left	1,200	490	360	No
		NB left/thru/right		530	860	No
		NB right		50	170	No
23	I-405 NB Off Ramp/Century Blvd	NB left	1,270	470	240	No
		NB right		160	310	No
30	Hawthorne Blvd/I-105 WB Ramps	WB left/right	4,000	200	280	No
		WB right		310	310	No
33	Prairie Ave/I-105 WB Ramps	EB left	2,600	220	290	No
		EB thru/right	3,000	190	500	No
35	I-105 EB Ramps/120th St	SB left	1,450	440	200	No
		SB right		20	20	No
37	Crenshaw Blvd/118th Place/ I-105 Ramps	WB left	1,350	260	670	No
		WB left/thru/right		270	670	No
		WB right		70	280	No

Source: Iteris, 2018

Notes: 95th percentile queue lengths are rounded up to the nearest 10.

* Storage lengths of off-ramps are equal to distance from intersection stop line to freeway mainline.

Threshold TRA-3: Substantial increase in hazards due to geometric design features or incompatible uses.

Impact TRA-3.2: Site-specific development projects permitted by the proposed TOD Plans would be subject to City and Public Works Department review of proposed roadway improvements, which would ensure that roadway design hazards are not created. No impact would result.

Methodology

Because the design of proposed roadway improvements would be subject to City standards and approval of the City's Public Works Department, no impacts would result. Thus, no impact would result, and further detailed analysis of this environmental issue was determined to be unnecessary.

Impact Assessment

Design of all proposed transportation and circulation features would be required to be consistent with the applicable City roadway design standards and Public Works Department requirements. The review of site-specific development projects and proposed roadway infrastructure proposed in fulfillment of the TOD Plan would ensure that proposed roadway improvements would not result in significant hazards.

Significance Conclusion for Impact TRA-3.2

Because detailed designs for roadway, pedestrian, or bicycle features for subsequent development within the TOD Plan areas would be reviewed as part of the City's development review process and would be required to meet all applicable design standards, this impact would be less than significant, and mitigation measures are not required.

Threshold TRA-4: Inadequate emergency access.

Impact TRA-4: The proposed TOD Plans would provide adequate emergency access to sites throughout the Plan areas, both during construction of site-specific development projects and ongoing operations. The resulting impact would be *less than significant*.

Methodology

Development that would impede emergency access by police, fire protection, or emergency medical vehicles to uses within the TOD Plan areas would constitute a significant impact. Because such emergency access could be impeded by permanent or temporary street closures

any such closures were evaluated to determine whether adequate alternative access would be provided to maintain access in an emergency by police, fire protection, or emergency medical personnel. Because emergency access could also be impeded by poor roadway or site design (e.g., inadequate lane widths or turning radii), the potential for roadway improvements or site-specific developments to impede emergency vehicle access was reviewed.

Impact Assessment

Existing emergency response routes to and within the TOD areas would either maintained in their present locations, with the exception of the proposed closure of Isis Avenue between Florence Avenue and Manchester Boulevard. This street closure would not have an adverse effect since emergency access would remain available to properties fronting along that segment of Isis Avenue from Florence Avenue and Manchester Boulevard.

As is standard for construction sites, a traffic control plan providing for adequate emergency access as determined by the Public Works Department, as well as fire protection and police authorities would be required should any temporary closure of streets or roadway lanes be necessary during construction.

Each site-specific development project within the TOD Plan areas would also be reviewed by the City, including review by police and fire agency authorities to ensure adequate emergency access to and within the site (e.g., minimum lane widths, minimum turning radii).

Significance Conclusion for Impact TRA-4

Because all site-specific development projects will be reviewed by the City, including the Public Works Department and police and fire protection authorities, implementation of the proposed TOD Plan would not result in inadequate emergency access. The impact would be less than significant, and no mitigation is required.

3.6.6 REFERENCES – TRANSPORTATION

Iteris, Westchester/Veterans & Crenshaw/Imperial Draft Traffic Impact Analysis, December 5, 2018.

3.7 AIR QUALITY

3.7.1 INTRODUCTION

a. Overview

This section evaluates the potential impacts on air quality resulting from site-specific development and infrastructure projects that would be permitted by the proposed TOD Plans for the Westchester/Veterans and Crenshaw/Imperial areas, including technical analyses prepared by Entech Consulting Group, for which modeling results are provided in Appendix C. This section addresses the potential for the TOD Plans to conflict with or obstruct implementation of the applicable air quality plan for the South Coast Air Basin, to violate an air quality standard or contribute substantially to an existing or projected air quality violation, to result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors that would affect a substantial number of people. The analyses in this section evaluate both the types and quantities of air pollutant emissions that would be generated on a temporary basis due to construction and those that would be generated over the long term from operations of the development permitted by the TOD Plans.

b. Definitions

Air Basin refers to area defined by geographic features that create a distinctive regional climate having similar meteorological and geographic conditions. The City of Inglewood and the TOD Plan areas are within the South Coast Air Basin.

Air District refers to the body responsible for managing air quality on a regional. California is currently divided into 35 air districts. The City of Inglewood and the TOD Plan areas are within the boundaries of the South Coast Air Quality Management District (SCAQMD).

Air Pollutants are the foreign and/or natural substances occurring in the atmosphere that may result in adverse effects on humans, animals, vegetation, and/or materials.

Air Quality Management Plan (AQMP) refers to the plan prepared by the SQAQMD for the purpose of bringing the South Coast Air Basin into compliance with national and California Ambient Air Quality Standards. The South Coast AQMP is incorporated along with AQMPs from other air basins into the State Implementation Plan (SIP).

Ambient Air Quality represents existing air conditions in a given area.

Ambient Air Quality Standards are the health and welfare-based standards prescribed by the Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) for

outdoor air that identify the maximum acceptable average concentrations of air pollutants during a specified period of time.

Attainment refers to regions that are meeting the primary standards established by EPA within the national ambient air quality standards (NAAQS) for six major pollutants termed criteria pollutants, based on data collected at permanent monitoring stations.

Area Sources of pollution include emissions that are spread over a wide area, such as consumer products, fireplaces, road dust, and farming operations.

Criteria Air Pollutants are those for which acceptable levels of exposure have been determined and for which an ambient air quality standard has been set by the California Air Resources Board. Such standards have been set for six criteria pollutants: ozone (O₃), carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and particulate matter (PM), which consists of PM that is 10 microns in diameter or less (PM₁₀) and PM that is 2.5 microns in diameter or less (PM_{2.5}).

Mobile Sources refers to sources of air pollution such as automobiles, motorcycles, trucks, off-road vehicles, boats, and airplanes that emit air pollutants while moving and when stopped.

Nonattainment refers to regions that are not meeting the primary standards established by EPA within the national ambient air quality standards (NAAQS) for six major pollutants termed criteria pollutants, based on data collected at permanent monitoring stations.

Sensitive Receptors include land uses, such as residences, schools, hospitals, children's day care facilities, elderly care facilities, and similar uses that are particularly sensitive to adverse air quality. A sensitive receptor also includes sensitive populations such as asthmatics, children, and the elderly who are particularly sensitive to air pollution.

Stationary Sources include non-mobile sources such as power plants, refineries, and manufacturing facilities that emit air pollutants from a fixed location.

Toxic Air Contaminants are defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health.

3.7.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

The proposed TOD Plans are subject to a range of state and local plans, policies, and regulations, which are described below.

a. Federal Plans, Policies and Regulations

Federal Clean Air Act

The federal Clean Air Act requires the U.S. Environmental Protection Agency (USEPA) to establish National Ambient Air Quality Standards (NAAQS) [Title 40 Code of Federal Regulations (CFR), Part 50] to protect public health and the environment from the effects of air pollutants. The USEPA has identified “criteria” pollutants that are known to cause harm to public health and the environment. Currently there are standards set for sulfur dioxide (SO₂), carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), and particulate matter less than ten micrometers in diameter (PM₁₀), particulate matter less than five micrometers in diameter (PM_{2.5}) and lead (Pb). These criteria pollutants are described below.

- **Sulfur Dioxide.** SO₂ is a colorless, extremely irritating gas or liquid that enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, and from chemical processes occurring at chemical plants and refineries. When SO₂ oxidizes in the atmosphere, it forms sulfur trioxide (SO₃). Collectively, these pollutants are referred to as sulfur oxides (SO_x).

Major sources of SO₂ include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of SO₂ aggravate lung diseases, especially bronchitis. This compound also constricts the breathing passages, especially in people with asthma and people involved in moderate to heavy exercise. SO₂ potentially causes wheezing, shortness of breath, and coughing. Long-term SO₂ exposure has been associated with increased risk of mortality from respiratory or cardiovascular disease.

- **Carbon Monoxide.** CO is a colorless and odorless gas, is a relatively non-reactive pollutant that is a product of incomplete combustion and is mostly associated with motor vehicles. When inhaled at high concentrations, CO combines with hemoglobin in the blood and reduces the oxygen-carrying capacity of the blood. This results in reduced oxygen reaching the brain, heart, and other body tissues. This condition is especially critical for people with cardiovascular diseases, chronic lung disease, or anemia. CO measurements and modeling were important in the early 1980s when CO levels were regularly exceeded throughout California. In more recent years, CO measurements and modeling have not been a priority in most California air districts due to the retirement of older polluting vehicles, lower emissions from new vehicles, and improvements in fuels.

- **Nitrogen Dioxide.** NO₂ is a reddish-brown gas that is a by-product of combustion processes. Automobiles and industrial operations are the main sources of NO₂. Combustion devices emit primarily nitric oxide (NO), which reacts through oxidation in the atmosphere to form NO₂. The combined emissions of NO and NO₂ are referred to as NO_x, which are reported as equivalent NO₂. Aside from its contribution to ozone formation, NO₂ can increase the risk of acute and chronic respiratory disease and reduce visibility. NO₂ may be visible as a coloring component of a brown cloud on high pollution days, especially in conjunction with high ozone levels.
- **Ozone.** Ozone is the main component of photochemical smog, is primarily a summer and fall pollution problem. Ozone is not emitted directly into the air but is formed through a complex series of chemical reactions involving other compounds that are directly emitted. These directly emitted pollutants (also known as ozone precursors) include reactive organic gases (ROGs) or volatile organic compounds (VOCs), and oxides of nitrogen (NO_x). While both ROGs and VOCs refer to compounds of carbon, ROG is a term used by CARB and is identified based on a list of carbon compounds that exempts carbon compounds determined by CARB to be nonreactive. VOC is a term used by the USEPA and is identified based on USEPA's separate list of exempted compounds it identifies as having negligible photochemical reactivity. The time period required for ozone formation allows the reacting compounds to spread over a large area, producing regional pollution problems. Ozone concentrations are the cumulative result of regional development patterns rather than the result of a few significant emission sources.

Once ozone is formed it remains in the atmosphere for one or two days. Ozone is then eliminated through reaction with chemicals on the leaves of plants, attachment to water droplets as they fall to earth (rainout), or absorption by water molecules in clouds that later fall to earth with rain (washout).

Short-term exposure to ozone can irritate the eyes and cause constriction of the airways. In addition to causing shortness of breath, ozone can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.

- **Particulate Matter.** PM₁₀ and PM_{2.5} consist of particulate matter that is 10 microns or less in diameter and 2.5 microns or less in diameter, respectively (a micron is one-millionth of a meter). PM₁₀ and PM_{2.5} represent fractions of particulate matter that can be inhaled into the air passages and the lungs and can cause adverse health effects. Acute and chronic health effects associated with high particulate levels include the aggravation of chronic respiratory diseases, heart and lung disease, and coughing, bronchitis, and respiratory illnesses in children. Recent mortality studies have shown an association between morbidity and mortality and daily concentrations of particulate matter in the air. Particulate matter can also damage materials and reduce visibility. One common source of PM_{2.5} is diesel exhaust emissions.

PM₁₀ consists of particulate matter emitted directly into the air (e.g., fugitive dust, soot, and smoke from mobile and stationary sources, construction operations, fires, and natural windblown dust) and particulate matter formed in the atmosphere by condensation and/or transformation of SO₂ and ROG. Traffic generates particulate matter emissions through entrainment of dust and dirt particles that settle onto roadways and parking lots. PM₁₀ and PM_{2.5} are also emitted by burning wood in residential wood stoves and fireplaces and open agricultural burning. PM_{2.5} can also be formed through secondary processes such as airborne reactions with certain pollutant precursors, including ROGs, ammonia (NH₃), NO_x, and SO_x.

- **Lead.** Lead is a metal found naturally in the environment and present in some manufactured products. There are a variety of activities that can contribute to lead emissions, which are grouped into two general categories, stationary and mobile sources. On-road mobile sources include light-duty automobiles; light-, medium-, and heavy-duty trucks; and motorcycles.

Emissions of lead have dropped substantially over the past 40 years. The reduction before 1990 is largely due to the phase-out of lead as an anti-knock agent in gasoline for on-road automobiles. Substantial emission reductions have also been achieved due to enhanced controls in the metals processing industry. In the Basin, atmospheric lead is generated almost entirely by the combustion of leaded gasoline and contributes less than one percent of the material collected as total suspended particulates. As lead has been well below regulatory thresholds for decades and the uses that would be permitted by the proposed TOD Plans are not a source of lead, lead is not discussed further in this analysis.

The Clean Air Act established two types of national air quality standards. Primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings. Federal standards are shown in **Table 3.7-1**.

The federal Clean Air Act also requires each state to prepare an air quality control plan, referred to as a state implementation plan (SIP). The federal Clean Air Act Amendments of 1990 added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is modified periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins, as reported by their jurisdictional agencies. USEPA is responsible for reviewing all SIPs to determine whether they conform to the mandates of the federal Clean Air Act and its amendments, and to determine whether implementing the SIPs would achieve air quality goals. In addition, the USEPA sets federal vehicle and stationary source emissions standards and provides research and guidance in air pollution programs.

TABLE 3.7-1: FEDERAL AND STATE AMBIENT AIR QUALITY STANDARDS FOR CRITERIA POLLUTANTS

Pollutant	Averaging Time ^a	State Standard	National Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Ozone (O₃)	1 hour	0.09 ppm	---	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Formed when ROG and NO _x react in the presence of sunlight. Major sources include on-road motor vehicles, solvent evaporation, and commercial / industrial mobile equipment.
	8 hours	0.070 ppm	0.070 ppm		
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Classified as a chemical asphyxiant, carbon monoxide interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm		
Nitrogen Dioxide (NO₂)	1 hour	0.18 ppm	100 ppb	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, and railroads.
	Annual Arithmetic Mean	0.030 ppm	53 ppb		
Sulfur Dioxide (SO₂)	1 hour	0.25 ppm	75 ppb	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	3 hours	---	0.5 ppm		
	24 hours	0.04 ppm	0.14 ppm		
	Annual Arithmetic Mean	---	0.030 ppm		
Respirable Particulate Matter (PM₁₀)	24 hours	50 µg/m ³	150 µg/m ³	May irritate eyes and respiratory tract, decreases in lung capacity, cancer, and increased mortality. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	Annual Arithmetic Mean	20 µg/m ³	---		
Fine Particulate Matter (PM_{2.5})	24 hours	---	35 µg/m ³	Increases respiratory disease, lung damage, cancer, and premature death. Reduces visibility and results in surface soiling.	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning; Also, formed from photochemical reactions of other pollutants, including NO _x , sulfur oxides, and organics.
	Annual Arithmetic Mean	12 µg/m ³	12.0 µg/m ³		
Lead (Pb)	30 Day Average	1.5 µg/m ³	---	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurological dysfunction (in severe cases).	Present source: lead smelters, battery manufacturing and recycling facilities. Past source: combustion of leaded gasoline.
	Calendar Quarter	---	1.5 µg/m ³		
	Rolling 3-Month Average	---	0.15 µg/m ³		
Hydrogen Sulfide	1 hour	0.03 ppm	No National Standard	Nuisance odor (rotten egg smell), headache and breathing difficulties (higher concentrations).	Geothermal power plants, petroleum production and refining.
Sulfates (SO₄)	24 hour	25 µg/m ³	No National Standard	Decrease in ventilatory functions; aggravation of asthmatic symptoms; aggravation of cardio-pulmonary disease; vegetation damage; degradation of visibility; property damage.	Industrial processes.

Pollutant	Averaging Time ^a	State Standard	National Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Visibility Reducing Particles	8-hour	Extinction of 0.23/km; visibility of 10 miles or more	No National Standard	Reduces visibility, reduced airport safety, lower real estate value, and discourages tourism.	See PM _{2.5} .
Vinyl Chloride	24-hour	0.01 ppm	No National Standard	Short-term exposure to high levels of vinyl chloride in the air can cause dizziness, drowsiness, and headaches. Long-term exposure through inhalation and oral exposure can cause liver damage. Cancer is a major concern from exposure to vinyl chloride via inhalation. Vinyl chloride exposure has been shown to increase the risk of angiosarcoma, a rare form of liver cancer in humans.	Polyvinyl chloride (PVC) plastic and vinyl products.

NOTE: ppm = parts per million; ppb = parts per billion; $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter.

^a The averaging time is the interval of time over which the sample results are reported. SOURCE: SCAQMD 2016.

b. State Plans, Policies, and Regulations

California Clean Air Act

In 1988, the state legislature passed the California Clean Air Act, which established California's air quality goals, planning mechanisms, regulatory strategies, and standards of progress for the first time. The California Clean Air Act provides the state with a comprehensive framework for air quality planning regulation and sets state air quality standards. The California Ambient Air Quality Standards, also shown in **Table 3.7-1**, incorporate additional standards for most of the criteria pollutants and has set standards for other pollutants recognized by the state such as sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. In general, the state standards are more health protective than the federal standards.

State Implementation Plan

The 1977 Clean Air Act Amendments require that regional planning and air pollution control agencies prepare a regional Air Quality Plan to outline the measures by which both stationary and mobile sources of pollutants can be controlled in order to achieve all standards specified in the Clean Air Act. For areas that are designated "nonattainment" with respect to a standard, the Clean Air Act specifies future dates for achieving compliance with the NAAQS and mandates that states submit and implement a State Implementation Plan (SIP) for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. Similarly, the 1988 California Clean Air Act also requires development of air quality plans and strategies to meet state air quality standards in areas designated as nonattainment (with the exception of areas designated as nonattainment for the state PM

standards). Maintenance plans are required for attainment areas that had previously been designated nonattainment in order to ensure continued attainment of the standards.

Toxic Air Contaminants

TACs have been regulated under federal air quality law since the 1977 Federal Clean Air Act Amendments. The most recent Federal Clean Air Act Amendments (1990) reflect a technology-based approach for reducing TACs. The first phase involves requiring facilities to install Maximum Achievable Control Technology (MACT). The MACT standards vary depending on the type of emitting source. USEPA has established MACT standards for over 20 facilities or activities, such as perchloroethylene dry cleaning and petroleum refineries. The second phase of control involves determining the residual health risk represented by air toxics emissions sources after implementation of MACT standards. Two principal laws provide the foundation for state regulation of TACs from stationary sources. In 1983, the State Legislature adopted Assembly Bill 1807, which established a process for identifying TACs and provided the authority for developing retrofit air toxics control measures on a statewide basis. Air toxics from stationary sources in California are also regulated under Assembly Bill 2588, the Air Toxics “Hot Spots” Information and Assessment Act of 1987. Regulation of TACs from mobile sources has traditionally been implemented through emissions standards for on-road motor vehicles (imposed on vehicle manufacturers) and through specifications for gasoline and diesel fuel sold in California (imposed on fuel refineries and retailers), rather than through land use decisions, air quality permits, or regulations addressing how motor vehicles are used by the general public.

In August 1998, CARB identified particulate emissions from diesel-fueled engines (diesel particulate matter, or DPM) as TACs. CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles (CARB, 2000). This document provides a plan to reduce diesel particulate emissions, with the goal of reducing emissions and the associated health risks by 75 percent in 2010 and by 85 percent in 2020. The program aims to require the use of state-of-the-art catalyzed diesel particulate filters and ultra-low sulfur diesel fuel on diesel-fueled engines.

c. Regional and Local Plans, Policies, and Regulations

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) is responsible for managing ambient air quality and setting regulations in the South Coast Basin, establishing an air quality monitoring network for measuring levels of criteria pollutants, administering funds to reduce regional mobile source emissions, and permitting stationary air pollutant sources, such as power plants, refineries, and gas stations.

South Coast Air Quality Management Plan

The SCAQMD is responsible for developing and adopting an Air Quality Management Plan, which serves as guidance to bring the region into compliance with federal and state air quality standards. The plan includes rules to reduce emissions from various sources, including specific types of equipment, industrial processes, paints, solvents, and other consumer products.

The 2016 AQMP was adopted by the SCAQMD Governing Board on March 23, 2017. The purpose of the 2016 AQMP for the SCAB is to set forth a comprehensive and integrated program to obtain regional compliance with the federal 24-hour PM_{2.5} air quality standard, and to provide an update to the SCAB's commitment towards meeting the federal 8-hour ozone standards (SCAQMD, 2016). The AQMP would also serve to satisfy recent USEPA requirements for a new attainment demonstration of the revoked 1-hour ozone standard, as well as a vehicle-miles travelled (VMT) emissions offset demonstration. Specifically, the AQMP would serve as the official SIP submittal for the federal 2006 24-hour PM_{2.5} standard, for which USEPA has established a due date of December 14, 2012. In addition, the AQMP updates specific new control measures and commitments for emissions reductions to implement the attainment strategy for the 8-hour ozone SIP. The 2012 AQMP sets forth programs which require integrated planning efforts and the cooperation of all levels of government: local, regional, state, and federal.

SCAQMD Rules and Regulations

All site-specific development and infrastructure projects are subject to SCAQMD rules and regulations in effect at the time of construction. Specific rules applicable to the site-specific development and infrastructure projects that would be permitted by the proposed TOD Plans would include the following:

Rule 401 – Visible Emissions. A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines.

Rule 402 – Nuisance. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Rule 403 – Fugitive Dust. This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust.

Rule 445 – Wood Burning. This rule prohibits permanently installed wood burning devices into any new development. A wood burning device means any fireplace, wood burning heater, or pellet-fueled wood heater, or any similarly enclosed, permanently installed, indoor or outdoor device burning any solid fuel for aesthetic or space-heating purposes, which has a heat input of less than one million British thermal units per hour.

Rule 481 – Spray Coating. This rule applies to all spray painting and spray coating operations and equipment and states that a person shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:

- The spray coating equipment is operated inside a control enclosure, which is approved by the Executive Officer. Any control enclosure for which an application for permit for new construction, alteration, or change of ownership or location is submitted after the date of adoption of this rule shall be exhausted only through filters at a design face velocity not less than 100 feet per minute nor greater than 300 feet per minute, or through a water wash system designed to be equally effective for the purpose of air pollution control.
- Coatings are applied with high-volume low-pressure, electrostatic and/or airless spray equipment.
- An alternative method of coating application or control is used which has effectiveness equal to or greater than the equipment specified in the rule.

Rule 1108 - Volatile Organic Compounds. This rule governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the Basin. This rule also regulates the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the site-specific development and infrastructure projects permitted by the TOD Plans must comply with SCAQMD Rule 1108.

Rule 1113 – Architectural Coatings. No person shall apply or solicit the application of any architectural coating within the SCAQMD with VOC content in excess of the values specified in a table incorporated in the Rule.

Rule 1143 – Paint Thinners and Solvents. This rule governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content.

This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

Rule 1186 - Fugitive Dust. This rule limits the presence of fugitive dust on paved and unpaved roads and sets certification protocols and requirements for street sweepers that are under contract to provide sweeping services to any federal, state, county, agency, or special district such as water, air, sanitation, transit, or school district.

Rule 1303 - Major Emission Sources. This rule governs the permitting of re-located or new major emission sources, requiring Best Available Control Measures and setting significance limits for PM₁₀ among other pollutants.

Rule 1401- New Source Review of Toxic Air Contaminants. This rule specifies limits for maximum individual cancer risk, cancer burden, and non-cancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units, which emit toxic air contaminants.

Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities. This rule provides work practice requirements to limit asbestos emissions from demolition and renovation activities associated disturbance of asbestos containing materials. The requirements for demolition and renovation activities include asbestos surveying, notification, asbestos containing materials removal procedures and time schedules, asbestos containing materials handling and clean-up procedures, and storage, disposal, and land filling requirements for asbestos containing waste materials. All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS)

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted "Connect SoCal," the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Connect SoCal integrates transportation planning with economic development and sustainability planning to comply with state greenhouse gas (GHG) emissions reduction goals, such as Senate Bill 375. Although the RTP/SCS is not technically an air quality plan or program, consistency with the RTP/SCS has air quality implications, including the reduction of VMT which reduces air quality emissions.

Connect SoCal projects that Inglewood will grow from a population of 120,800 in 2020 to 129,000 people in 2040. Between 2020 and 2040, Connect SoCal projects that the number of households in Inglewood will grow from 40,400 to 43,300, while local employment opportunities will increase from 9,900 to 10,900.

The following strategies are intended to be supportive of implementing the regional Sustainable Communities Strategy. Several are directly tied to supporting related GHG reductions while others support the broader goals of Connect SoCal:

Focus Growth Near Destinations & Mobility Options

- Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.
- Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.
- Plan for growth near transit investments and support implementation of first/last mile strategies.
- Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).
- Identify ways to “right size” parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)

Leverage Technology Innovations

- Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space.
- Improve access to services through technology – such as telework and telemedicine as well as other incentives such as a “mobility wallet,” an app-based system for storing transit and other multi-modal payments.
- Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation.

Support Implementation of Sustainability Policies

- Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.
- Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations.

Promote a Green Region

- Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.

Connect SoCal identifies Priority Growth Areas (PGAs) that follow the principles of “center-focused placemaking,” including “locations where many Connect SoCal strategies can be fully realized.” Connect SoCal identifies several types of PGAs – Job Centers, Transit Priority Areas, High-Quality Transit Areas, Neighborhood Mobility Areas, Livable Corridors, and Spheres of Influence – that account for only 4 percent of region’s total land area, while accommodating 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2016 and 2045.

The purpose of this more compact form of regional development is to:

- Reduce travel distances;
- Increase mobility options;
- Improve access to workplaces; and
- Conserve the region’s resource areas.

The Westchester/Veterans and Crenshaw/Imperial TOD areas are identified as Transit Priority Areas (TPAs), which are Priority Growth Areas that are within one half mile of existing or planned ‘major’ transit stops¹.

3.7.3 ENVIRONMENTAL SETTING

a. Existing Air Quality

Regional Setting

The ambient concentrations of air pollutants within the basin are determined by the amount of emissions released by sources and the atmosphere’s ability to transport and dilute the emissions. Air quality conditions are generated by topography, wind speed, wind direction, air temperature gradients, and emissions released by air pollutant sources, which interact to move and disperse air pollutants.

The TOD Plan areas are located within SCAB. The topography and climate within SCAB make it an area of high air pollution potential. The SCAB is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind

¹ A ‘major’ transit stop is defined as a site containing an existing or planned rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

speeds. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cool marine layer and inhibits the pollutants in the marine layer from dispersing upward. In addition, light winds during the summer further limit ventilation, and sunlight triggers the photochemical reactions that produce ozone.

Local Setting

SCAQMD maintains monitoring stations within district boundaries that monitor air quality and compliance with associated ambient standards. The City of Inglewood is located in the Source Receptor Area 3, Southwest Coastal LA County. The closest air monitoring station to the TOD Plan area is the LAX Hastings monitoring station (7201 W Westchester Parkway) that monitors O₃, CO, SO₂, NO₂, and PM₁₀. The Los Angeles County Station 1 (1305 E Pacific Coast Highway, Long Beach) is the closest site to the TOD Plan areas that monitors PM_{2.5}. Concentrations from the monitoring stations for the most recent three years (2015 - 2017) are shown in **Table 3.7-2**.

Both CARB and USEPA use this type of monitoring data to designate areas according to their attainment status for criteria air pollutants. The purpose of these designations is to identify the areas with air quality problems and thereby initiate planning efforts for improvement. The three basic designation categories are nonattainment, attainment, and unclassified. Unclassified is used in an area that cannot be classified on the basis of available information as meeting or not meeting the standards. In addition, the California designations include a subcategory of nonattainment-transitional, which is given to nonattainment areas that are progressing and nearing attainment. The current attainment status for the SCAB is provided in **Table 3.7-2**.

Both CARB and USEPA use this type of monitoring data to designate areas according to their attainment status for criteria air pollutants. The purpose of these designations is to identify the areas with air quality problems and thereby initiate planning efforts for improvement. The three basic designation categories are nonattainment, attainment, and unclassified. Unclassified is used in an area that cannot be classified on the basis of available information as meeting or not meeting the standards. In addition, the California designations include a subcategory of nonattainment-transitional, which is given to nonattainment areas that are progressing and nearing attainment. The current attainment status for the SCAB is provided in **Table 3.7-3**.

TABLE 3.7-2: AIR QUALITY DATA SUMMARY (2015-2017)

Pollutant	Monitoring Data by Year			
	Standard ^a	2015	2016	2017
Ozone				
Highest 1 Hour Average (ppm)		0.096	0.087	0.086
Days over State Standard	0.09 ppm	1	0	0
Highest 8 Hour Average (ppm)		0.077	0.08	0.07
Days over Federal Standard	0.070 ppm	3	2	0
Days over State Standard	0.070 ppm	3	2	0
Carbon Monoxide				
Highest 8 Hour Average (ppm)		1.4	1.3	1.6
Days over Federal Standard	9.0 ppm	0	0	0
Days over State Standard	9.0 ppm	0	0	0
Nitrogen Dioxide				
Highest 1 Hour Average (ppb)		87	82	72
Days over Federal Standard	100 ppb	0	0	0
Days over State Standard	0.18 ppm	0	0	0
Annual Average (ppb)		10.98	10.13	9.26
Days over Federal Standard	53 ppb	0	0	0
Days over State Standard	0.030 ppm	0	0	0
Sulfur Dioxide				
Highest 1 Hour Average (ppm)		0.01	0.01	0.02
Days over Federal Standard	0.14 ppm	0	0	0
Days over State Standard	0.04 ppm	0	0	0
Particulate Matter (PM₁₀)				
Highest 24 Hour Average (µg/m ³) ^b		42	43	46
Days over Federal Standard (measured) ^c	150 µg/m ³	0	0	0
Days over State Standard (measured) ^c	50 µg/m ³	0	0	0
Particulate Matter (PM_{2.5})				
Highest 24 Hour Average (µg/m ³) ^b		48.3	28.9	53.6
Days over Federal Standard (measured) ^c	35 µg/m ³	NP	NP	NP
Annual Average (µg/m ³) ^b		10.3	9.6	11

NOTES:

ppm = parts per million; µg/m³ = micrograms per cubic meter.

^a Generally, state standards and national standards are not to be exceeded more than once per year.

^b Values represent federal statistics and are midnight-to-midnight 24-hour averages. State and federal statistics may differ because of different sampling methods.

^c NP-Not provided

SOURCE: EPA, 2015, 2016, 2017. <https://www.epa.gov/outdoor-air-quality-data/monitor-values-report>

TABLE 3.7-3: SOUTH COAST AIR BASIN ATTAINMENT STATUS

Pollutant	Attainment Status	
	Federal Standards	State Standards
Pollutant	Federal Standards	State Standards
Ozone (1-hour)	Non-attainment/Extreme	Non-attainment
Ozone (8-hour)	Non-attainment/Extreme	Non-attainment
PM ₁₀	Attainment/Maintenance	Non-attainment
PM _{2.5}	Non-attainment	Non-attainment
Carbon Monoxide	Attainment/Maintenance	Attainment
Nitrogen Dioxide	Attainment/Maintenance	Attainment
Sulfur Dioxide	Attainment	Attainment
Sulfates	N/A	Attainment
Lead	Non-attainment	Non-attainment
Hydrogen Sulfide	N/A	Attainment
Visibility Reducing Particles	N/A	Attainment
Vinyl	N/A	Attainment

Source: CARB, 2016

Toxic Air Contaminants

Concentrations of toxic air contaminants, or in federal parlance, hazardous air pollutants (HAPs), are also used as indicators of ambient air quality conditions. Toxic air contaminants can cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. Toxic air contaminants are usually present in minute quantities in the ambient air; however, their high toxicity and associated health risk may pose a threat to public health even at low concentrations.

According to The California Almanac of Emissions and Air Quality (CARB, 2009), the majority of the estimated health risk from toxic air contaminants can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines. Diesel particulate matter differs from other toxic air contaminants in that it is not a single substance, but rather a complex mixture of hundreds of substances. Although diesel particulate matter is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emission control system is present.

Unlike the other toxic air contaminants, no ambient monitoring data are available for diesel particulate matter because no routine measurement method currently exists. However, CARB has made preliminary concentration estimates based on a particulate matter exposure method.

This method uses the CARB emissions inventory's PM₁₀ database, ambient PM₁₀ monitoring data, and the results from several studies to estimate concentrations of diesel particulate matter. In addition to diesel particulate matter, the toxic air contaminants for which data are available that pose the greatest existing ambient risk in California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene.

Stationary source toxic air contaminants tend to be approximately the same level year-round. However, toxic air contaminants from mobile sources tend to be higher during the fall and winter months (SCAQMD 2000). According to the MATES III Model Estimated Carcinogenic Risk, the TOD Plan areas are within five cancer risk zones where risk ranges from 500 in one million to 1,200 in one million. The TOD Plan areas are identified as having an overall cancer risk of 885 in one million, which is largely due to diesel particulate emissions from roadways (SCAQMD 2016).

Odor Emissions

Odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). Offensive odors are unpleasant and can lead to public distress generating citizen complaints to local governments. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source, wind speed, direction, and the sensitivity of receptors. There are no existing land uses in the TOD Plan areas that generate substantial amounts of noxious odorous emissions.

3.7.4 SIGNIFICANCE CRITERIA

Criteria outlined in CEQA Guidelines were used to determine the level of significance of air quality impacts. Appendix G of state CEQA Guidelines indicates that a project would have a significant effect if it were to:

- AQ-1 Conflict with or obstruct implementation of the applicable air quality plan;
- AQ-2 Violate any air quality standard, contribute substantially to an existing or projected air quality violation;
- AQ-3 Result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);

AQ -4 Expose sensitive receptors to substantial pollutant concentrations; or

AQ -5 Create objectionable odors affecting a substantial number of people.

3.7.5 IMPACTS AND MITIGATION MEASURES

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

Impact AQ-1: Development permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would generate population and employment growth as the direct result of new transit-oriented development within the TOD Plan areas and indirectly by creating a need for housing for new employees. Because population and employment growth that would result from the TOD Plans exceeds regional growth projections, project-related population and employment growth is considered to be unplanned.

However, the TOD Plans represent the type of high-density mixed use, transit-oriented development that is sought after by the regional SCS and AQMP. The TOD plans would not result in any significant unavoidable impacts and would not increase the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

The proposed TOD Plans are therefore consistent with the Air Quality Management Plan for the South Coast Air Basin and impacts would be *less than significant*.

Methodology

The proposed TOD Plan areas are within the jurisdiction of the SCAQMD which has adopted and administers the air quality plan for the region -- the South Coast Air Quality Management Plan (AQMP). Projects that are consistent with the regional population, housing, and employment forecasts identified by SCAG are considered to be consistent with the AQMP growth projections, since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the AQMP.

SCAQMD's CEQA Handbook suggests an evaluation of the following two criteria to determine whether a project involving a legislative land use action (such as the proposed TOD Plans) would be consistent or in conflict with the AQMP:

- The project would not generate population and employment growth that would be inconsistent with SCAG's growth forecasts.
- The project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency Criterion No. 1 refers to the SCAG's growth forecasts, and associated assumptions included in the AQMP. The future air quality levels projected in the AQMP are based on SCAG's growth projections, which are based, in part, on the general plans of cities located within the SCAG region.

Consistency Criterion No. 2 refers to the California Ambient Air Quality Standards. The SCAQMD has identified CO as the best indicator pollutant for determining whether air quality violations would occur since it is most directly related to automobile traffic, the emissions of which have been modeled by the SCAQMD to determine future air quality conditions.

Impact Assessment

The TOD Plan areas are located within the South Coast Air Basin and the jurisdictional boundaries of the SCAQMD. The SCAQMD and Southern California Association of Governments (SCAG) are responsible for preparing Air Quality Management Plan (AQMP) for the South Coast Air Basin to address federal and state Clean Air Act requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin. In preparation of the AQMP, SCAQMD and SCAG use land use designations contained in General Plan documents to forecast, inventory, and allocate regional emissions from land use and development-related sources.

As discussed in relation to Impact POP-1, above, development permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would generate population and employment growth in excess of projections for the City of Inglewood as the direct result of new transit-oriented development within the TOD Plan areas and indirectly by creating a need for housing for new employees. However, the TOD Plans represent infill development in an urbanized area with existing infrastructure near major transit stops along Metro light rail lines consistent with regional SCS goals. In addition, the net increase in housing that would be provided by the TOD Plans is needed to meet the City's fair share of regional housing needs per the RHNA adopted by SCAG. The employment proposed by the TOD Plans would improve the City's jobs-to-housing ratio and reduce vehicle miles traveled to work. As discussed in Section

3.1.2e of this EIR, the result of such development improvements proposed in the TOD Plans will be substantial reductions in VMT per service population compared to existing or nearby future development. Build out of the TOD Plans would also improve bicycle and pedestrian facilities, including non-motorized access to transit. Thus, the TOD Plan would support AQMP objectives to reduce trips and balance jobs and housing and would aid in the implementation of the AQMP.

Because the TOD Plans propose infill and redevelopment in proximity to major transit stops, they would utilize, existing infrastructure, as roadways, drainage, sewer, and other infrastructure, and would be consistent with the SCAG objective to “Encourage patterns of urban development and land use that reduce costs in infrastructure construction and make better use of existing facilities.” The TOD Plans would also be consistent with SCAG’s objective to reduce vehicle use and promote infill development. As a result, the TOD Plans would comply with Consistency Criterion No. 1 listed above in the Methodology Section.

In regard to Consistency Criterion No. 2, which evaluates the potential of the proposed TOD Plans to increase the frequency or severity of existing air quality violations, the CO hotspot screening analysis (described below) indicates that the TOD Plans would not result in a violation of the state one-hour or eight-hour CO concentration standards and no significant adverse impacts are anticipated. Therefore, the TOD Plan is consistent with Consistency Criterion No. 2, and impacts related to conflict with or obstruction with an applicable air quality plan would be less than significant.

Significance Conclusion for Impact AQ-1

Overall, the TOD Plan would be consistent AQMP Consistency Criteria 1 and 2. The TOD Plans are consistent with existing regional growth projections, would not result in or increase the occurrence of air quality violations, and would support AQMP objectives to reduce trips and balance jobs and housing. Therefore, the TOD Plans would assist in implementing the AQMP, and impacts related to conflict or obstruction of the AQMP would be less than significant.

Threshold AQ-2: **Violate any air quality standard, contribute substantially to an existing or projected air quality violation, or result in cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment.**

Impact AQ-2.1: **Construction of site-specific development permitted by the TOD Plans would generate emissions of criteria pollutants exceeding applicable SCAQMD thresholds for ROG and NO_x. Daily unmitigated emissions would also exceed the applicable SCAQMD LSTs for NO_x, PM₁₀ and PM_{2.5} for a one-acre site in Source Receptor Area 3 when more than one site-specific**

development or infrastructure project is constructed within 82 feet of the same receptor. PM₁₀ and PM_{2.5} emissions would exceed LST thresholds if two or more site-specific development or infrastructure projects are constructed at the same time and within 82 feet of the same receptor. For NO_x, exceedance of the LST threshold would occur if three or more site-specific development or infrastructure projects are constructed within 82 feet of the same receptor at the same time but would not exceed localized significance thresholds for any criteria pollutant.

Compliance with applicable SCAQMD rules and implementation of EIR Mitigation Measures AQ-2.1a and AQ-2.1b would reduce impacts to less than significant. Construction impacts would be *significant but mitigable*.

Methodology

Regional Air Pollutant Emissions

Short-term construction-generated emissions of criteria air pollutants and ozone precursors associated with the site-specific development and infrastructure projects that would be permitted by the proposed TOD Plans were modeled using the California Emissions Estimator Model (CalEEMod), Version 2013.2.2, as recommended by SCAQMD. Construction equipment horsepower and load factors are based on the CalEEMod model defaults. The model results were used to determine whether short-term construction-related emissions of criteria air pollutants associated with the TOD Plan would exceed SCAQMD's applicable regional thresholds and whether mitigation would be required.

Construction of new land uses within the Westchester/Veterans and Crenshaw/Imperial areas permitted by the proposed TOD Plans will occur as the result of numerous market-driven developments on sites throughout the TOD Plan areas over an estimated 20-year period. Thus, the specific location and timing of any site-specific development of infrastructure project within the TOD Plan areas cannot be precisely determined, nor is it possible to precisely determine the number and location of individual sites that may be undergoing demolition, site preparation, and construction on any given day. However, given the total amount of development that is anticipated to occur within the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas over the estimated 20-year buildout period, it is possible to estimate the overall amount of demolition, site preparation, and construction that might occur on the "maximum construction day" during buildout.

Based on the size of existing parcels, changes to existing land use proposed by the TOD Plans and the location of potential development sites within the Westchester/Veterans and

Crenshaw/Imperial areas, construction activities during a theoretical “maximum construction day” were defined and quantified. Given a 20-year buildout, a conservative assumption was made that approximately 10 percent of the total development proposed in the TOD Plan would be undergoing some stage of development (demolition, site preparation, and construction) on the theoretical “maximum construction day.” Anticipated development activities during the theoretical “maximum construction day” are thus indicated in **Table 3.7-4**, below. Modeling Assumptions and output files are provided in EIR Appendix C.

TABLE 3.7-4: THEORETICAL MAXIMUM CONSTRUCTION DAY

	Residential Units	Non-Residential Square Footage	Acres	# of Sites
Westchester/Veterans				
Demolition (buildings)	4	46,500		2
Site Preparation (clearing and grading)			4.4	2
Construction (Buildings)	114	142,200		2
(Paving of Parking and Roads)			3.2	2
Crenshaw/Imperial				
Demolition (buildings)	8	66,340		2
Site Preparation (clearing and grading)			6.3	3
Construction (Buildings)	306	42,180		3
(Paving of Parking and Roads)			4.2	3
TOD PLANS TOTAL				
Demolition (buildings)	12	112,840		4
Site Preparation (clearing and grading)			10.5	4
Construction (Buildings)	420	184,380		4
(Paving of Parking and Roads)			7.4	5

Because it is mandatory for construction projects in the South Coast Air Basin to comply with SCAQMD Rule 403 for fugitive dust that include, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the construction site, and maintaining effective cover over exposed areas, the effects of compliance with this Rule are included in the analysis of impacts before mitigation.

Construction activities would be required to comply SCAQMD Rule 402, which identifies standards to reduce quantities of air contaminants or other materials which cause injury,

detriment, nuisance, or annoyance to any considerable number of persons or the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause or have natural tendency to cause injury or damage to business or property. SCAQMD Rule 403 regulates operations, which periodically may cause fugitive dust emissions into the atmosphere. SCAQMD Rule 1108 governs the VOC content of asphalt, Rules 1113 and 1143 that govern the VOC content in architectural coating, paint, thinners, and solvents, was accounted for in the construction emissions modeling. Furthermore, the use of low VOC coatings was included to reduce the ROG emissions that would be generated from the application of architectural coating. Compliance with these Rules is included in the analysis of impacts before mitigation.

Construction scheduling was based on CalEEMod defaults and typical construction scheduling, and CalEEMod default equipment was used. The emissions estimates are based on the estimate of 10 percent of the net development could occur in any given year. Due to the changeover in construction fleets as old equipment is replaced with new, it is anticipated that maximum daily emissions would decrease as development occurs in future years.

A significant construction impact would result if daily emissions during the maximum construction day would exceed SCAQMD's established daily emissions thresholds for criteria pollutants (see **Table 3.7-5**).

TABLE 3.7-5 SCAQMD REGIONAL AIR QUALITY SIGNIFICANCE THRESHOLDS

Pollutant	Daily Emissions Thresholds (lbs/day)	
	Construction	Operations
Oxides of Nitrogen (NO _x)	100	55
Reactive Organic Gases (ROG)	75	55
Respirable Particulate Matter (PM ₁₀)	150	150
Fine Particulate Matter (PM _{2.5})	55	55
Oxides of Sulfur (SO _x)	150	150
Carbon Monoxide (CO)	550	550
Lead ^a	3	3

^a Because the proposed TOD Plans do not involve development of any major lead emissions sources, lead emissions are not analyzed further.

SOURCE: SCAQMD 2016.

In addition, to determine whether or not construction activities associated with the proposed TOD Plans would create significant adverse localized air quality impacts on nearby sensitive receptors, the worst-case daily emissions contribution from the site-specific development and infrastructure projects permitted by the proposed TOD Plans were compared to SCAQMD's localized significance thresholds (LSTs). The analysis of localized air quality impacts focuses

only on the onsite activities of a construction project and does not include emissions that are generated off-site such as from on-road haul or delivery truck trips (SCAQMD, 2009).

For the purpose of analyzing localized air quality impacts, SCAQMD has developed LSTs for three project site sizes: 1 acre, 2 acres and 5 acres. The LSTs established for each of the site acreages represent the amount of pollutant emissions that would not exceed the most stringent applicable federal or state ambient air quality standards. The LST threshold for a five-acre site was used because the site-specific development and infrastructure projects that would be permitted by the proposed TOD Plans averaged in size of a 5-acre site. The SCAQMD only provides LSTs at receptor distances of 82, 164, 328, 656, and 1,640 feet from the emissions source, the LSTs for a receptor distance of 82 feet from a specific project site is used for determining significance because site-specific development and infrastructure projects permitted by the proposed TOD Plans could be adjacent to existing sensitive receptors, and the LST receptor distance of 82 feet is the closest identified by SCAQMD thresholds.

In conducting the localized air quality analysis, which focuses only on onsite emissions, the site-specific project's onsite construction emissions generated from combustion sources (e.g., off-road construction equipment) under a worst-case construction scenario were extracted from the CalEEMod model run outputs. Overall, the daily total onsite combustion, mobile, and fugitive dust emissions associated with construction of a site-specific project were combined and evaluated against SCAQMD's LSTs for a one-acre site. CalEEMod data is provided in the EIR's Appendix C, *Air Quality*.

A significant impact would occur if emissions during the maximum construction day would exceed SCAQMD's localized significance thresholds (see **Table 3.7-6**).

TABLE 3.7-6 SCAQMD LOCALIZED SIGNIFICANCE THRESHOLDS FOR A FIVE-ACRE SITE

Pollutant Monitored Within Source Receptor Area 3: Southwest Coastal Los Angeles County	Allowable Emissions (pounds/day) at 82 Feet (25 Meters)	
	Construction	Operation
Nitrogen Oxides (NO _x)	197	197
Carbon Monoxide (CO)	1,796	1,796
Respirable Particulate Matter (PM ₁₀)	15	15
Fine Particulate Matter (PM _{2.5})	8	8

Source: SCAQMD, 2009

Impact Assessment

Construction Impacts in Relation to SCAQMD Regional Significance Thresholds

Construction activities would occur intermittently at different sites in the TOD Plan areas throughout a 20-year build out period. Although construction impacts at any one location would be temporary, construction of individual site-specific development and infrastructure projects permitted by the TOD Plans could cause adverse effects on local air quality.

Construction activities could generate substantial amounts of dust (including PM₁₀ and PM_{2.5}), primarily from “fugitive” sources (i.e., emissions released through means other than a stack or tailpipe) and other criteria air pollutants primarily from the operation of heavy construction equipment (primarily diesel) and construction worker vehicles (primarily gasoline operated).

Fugitive dust emissions would vary from day to day, depending on the level and type of activity, silt content of the soil, and the prevailing weather. Sources of fugitive dust during construction could include vehicle movement over paved and unpaved surfaces, demolition, excavation, earth movement, grading, and wind erosion from exposed surfaces.

In addition, buildings constructed prior to 1980 can contain asbestos used in insulation, fire retardants, or building materials (floor tile, roofing, etc.) and lead-based paint. As such, demolition activities of such buildings could involve removal and disposal of asbestos and lead-based paint. Airborne asbestos fibers and lead dust pose a serious health threat. The demolition, renovation and removal of asbestos-containing building materials would be subject to the requirements of SCAQMD Rule 1403, which are described above.

Construction activities would also result in the emission of other criteria pollutants from equipment exhaust, construction-related vehicular activity, and construction worker automobile trips. Emission levels for construction activities would vary depending on the number and type of equipment, duration of use, operation schedules, and the number of construction workers. Criteria pollutant emissions of ROG and NO_x from these emission sources would incrementally add to the regional atmospheric loading of ozone precursors during construction of site-specific development and infrastructure projects permitted by the proposed TOD Plans.

Mobile source emissions, primarily NO_x, would result from the use of construction equipment such as graders, backhoes, and cranes. During site development finishing, paving operations, and the application of architectural coatings (i.e., paints) and other building materials would release ROG. The assessment of construction air quality impacts considers each of these potential sources.

Unmitigated daily construction-related emissions are presented in **Table 3.7-7**, which shows the highest daily emission estimate for each construction phase. **Table 3.7-8** provides the daily construction emissions for the maximum construction day, which accounts for the overlap of

various construction phases from multiple site-specific development or infrastructure projects occurring at the same time within the TOD Plan areas. As shown, thresholds are exceeded for ROG and NO_x during the maximum construction day. Calculations and modeling output are included in Appendix C.

TABLE 3.7-7: UNMITIGATED CONSTRUCTION EMISSIONS FOR INDIVIDUAL CONSTRUCTION ACTIVITIES

	Estimated Maximum Daily Emissions (lbs/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
DEMOLITION						
Fugitive Dust Emissions	-	-	-	-	5.6	0.8
Off-Road Emissions	3.82	38.3	22.3	0.04	2.0	1.8
On-Road Emissions	0.33	8.2	2.4	0.02	0.7	0.2
Total Emissions	4.05	46.5	24.7	0.06	8.3	2.8
<i>SCAQMD Significance Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Significant Impact?	No	No	No	No	No	No
SITE PREPARATION						
Fugitive Dust Emissions	-	-	-	-	19.2	10.1
Off-Road Emissions	4.6	48.20	22.50	0.04	2.60	2.4
On-Road Emissions	0.1	0.08	0.8	0.002	0.2	0.05
Total Emissions	4.7	48.3	23.3	0.04	22.0	12.6
<i>SCAQMD Significance Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Significant Impact?	No	No	No	No	No	No
GRADING						
Fugitive Dust Emissions	-	-	-	-	6.58	3.4
Off-Road Emissions	2.6	28.34	16.3	0.03	1.3	1.3
On-Road Emissions	0.08	0.06	0.61	0.001	0.17	0.05
Total Emissions	2.7	28.4	16.9	0.03	8.1	4.8
<i>SCAQMD Significance Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Significant Impact?	No	No	No	No	No	No
BUILDING CONSTRUCTION						
Fugitive Dust Emissions	-	-	-	-	-	-
Off-Road Emissions	2.3	21.1	17.2	0.03	1.3	1.2
On-Road Emissions	3.2	16.6	24.2	0.09	6.5	1.8
Total Emissions	5.5	37.7	41.4	0.12	7.8	3.0
<i>SCAQMD Significance Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Significant Impact?	No	No	No	No	No	No
PAVING						
Fugitive Dust Emissions	-	-	-	-	-	-
Off-Road Emissions	1.5	15.2	14.7	0.03	0.08	0.8

	Estimated Maximum Daily Emissions (lbs/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
On-Road Emissions	1.0					
Total Emissions	2.5	15.2	14.7	0.03	0.08	0.8
SCAQMD Significance Threshold	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
ARCHITECTURAL COATING						
Fugitive Dust Emissions	68.15	-	-	-	-	-
Off-Road Emissions	0.03	0.1	1.8	0.003	0.004	0.004
On-Road Emissions	0.5	0.3	3.8	0.01	0.008	0.2
Total Emissions	68.68	0.4	5.5	0.013	0.012	0.204
SCAQMD Significance Threshold	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No

Source: Entech, 2018

TABLE 3.7-8: UNMITIGATED CONSTRUCTION EMISSIONS FOR MAXIMUM CONSTRUCTION DAY

	Estimated Maximum Daily Emissions (lbs/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Total Emissions	88.1	176.5	126.5	0.3	46.3	24.2
Regional Significance Threshold	75	100	550	150	150	55
Significant Impact?	Yes	Yes	No	No	No	No

Source: Entech, 2018

Construction Impacts in Relation to SCAQMD Local Significance Thresholds

Daily on-site construction emissions generated by the proposed TOD Plans were evaluated against SCAQMD's LSTs for a one-acre site to determine whether the emissions would cause or contribute to adverse localized air quality impacts. Because TOD Plans provide for infill mixed-use development, it was assumed that the nearest sensitive receptor would be adjacent to the site-specific development project under construction. Since the mass rate look-up tables provided by SCAQMD identify 82 feet as the closest receptor distance, 82 feet was used to evaluate the potential localized air quality impacts associated with the maximum construction day emissions from the TOD Plans.

Table 3.7-9 identifies the daily unmitigated, localized on-site emissions that are estimated to occur during the TOD Plans' maximum construction day. As shown, the daily unmitigated emissions would exceed the applicable SCAQMD LSTs for NO_x, PM₁₀ and PM_{2.5} for a one-acre site in Source Receptor Area 3 when more than one site-specific development or infrastructure project is constructed within 82 feet of the same receptor. PM₁₀ and PM_{2.5} emissions would exceed LST thresholds if two or more site-specific development or infrastructure projects are

constructed at the same time and within 82 feet of the same receptor. For NO_x, exceedance of the LST threshold would occur if three or more site-specific development or infrastructure projects are constructed within 82 feet of the same receptor at the same time. The emissions for the remaining pollutant of concern (CO) would not exceed the applicable SCAQMD LST under any scenario.

TABLE 3.7-9: LOCALIZED UNMITIGATED POLLUTANT CONCENTRATIONS FROM CONSTRUCTION ACTIVITIES

	Daily Maximum Construction Day Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Individual Maximum Construction Day Activities				
Demolition	46.5	24.7	8.3	2.8
Site Prep	48.3	23.3	22	12.6
Grading	28.4	16.9	8.1	4.8
Building Construction	37.7	41.4	7.8	3
Paving	15.2	14.7	0.03	0.08
Architectural Coating	0.4	5.5	0.012	0.20
Maximum Construction Day Total	176.5	126.5	46.3	24.2
SCAQMD Thresholds				
1-acre	91	664	5	3
2-acre	131	967	8	5
5-acre	197	1796	15	8
Significant?	Yes	No	Yes	Yes

Source: Entech, 2018

As distances between site-specific development or infrastructure projects and receptors increase, the allowed daily emissions increase, and at 656 feet between construction sites and the nearest receptor, the worst-case construction day would be less than significant for all criteria pollutants of concern. However, because it is unknown how many site-specific development or infrastructure projects might be under construction at the same time and what the distances would be between those projects and the nearest receptor(s), a worst-case assessment was assumed with respect to LST impacts. The TOD Plans' maximum construction day emissions would exceed SCAQMD's applicable Localized Significance Threshold for NO_x, PM₁₀, PM_{2.5} during overlap of impacts from multiple site-specific development or infrastructure construction projects.

Significance Conclusion for Impact AQ-2.1

Construction of site-specific development permitted by the proposed TOD Plans would generate emissions of criteria pollutants exceeding applicable SCAQMD regional thresholds for ROG and NO_x.

Daily unmitigated emissions would exceed the applicable SCAQMD LSTs for NO_x, PM₁₀ and PM_{2.5} for a one-acre site in Source Receptor Area 3 when more than one site-specific development or infrastructure project is constructed within 82 feet of the same receptor. PM₁₀ and PM_{2.5} emissions would exceed LST thresholds if two or more site-specific development or infrastructure projects are constructed at the same time and within 82 feet of the same receptor. For NO_x, exceedance of the LST threshold would occur if three or more site-specific development or infrastructure projects are constructed within 82 feet of the same receptor at the same time but would not exceed localized significance thresholds for any criteria pollutant.

Mitigation Measures

Mitigation Measure AQ-2.1a: All onsite vehicles and equipment used in construction within the TOD Plan areas that has horsepower greater than 50 shall meet, at a minimum, USEPA Tier IV interim engine certification requirements. If Tier IV interim equipment is not available, the contractor may apply other available technologies available for construction equipment such that it would achieve a comparable reduction in NO_x and PM emissions comparable to that of Tier IV construction equipment. Where alternatives to USEPA Tier IV are utilized, the contractor shall be required to show evidence to the City that these alternative technologies would achieve comparable emissions reductions. Certifications or alternative reduction strategies shall be required prior to receiving a construction permit.

Implementation: Conditions of approval for site-specific development shall include the requirements of Mitigation Measure AQ-2a to be incorporated into construction contract documents. These contract documents shall be reviewed by the City prior to the issuance of demolition, grading, and construction contracts.

Mitigation Measure AQ-2.1b: All active construction areas shall be watered at least four times daily to reduce fugitive dust emissions from grading, excavation, and other ground preparation. Watering shall be

sufficient to prevent airborne dust from leaving the site.

Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water shall be used whenever it is available.

Implementation: Conditions of approval for site-specific development shall include the requirements of Mitigation Measure AQ-2.1b to be incorporated into construction contract documents. These contract documents shall be reviewed by the City prior to the issuance of demolition, grading, and construction contracts.

Conclusion with Implementation of Mitigation Measures

With implementation of Mitigation Measures AQ-2.1a and AQ-2.1b, construction emissions would be reduced to less than significant.

As shown in **Table 3.7-10**, with implementation of Mitigation Measures AQ-2.1a and AQ-2.1b daily construction-related emissions would be reduced to less than significant during the maximum construction day.

TABLE 3.7-10: LOCALIZED MITIGATED POLLUTANT CONCENTRATIONS FROM CONSTRUCTION ACTIVITIES

Construction Activities	Estimated Maximum Daily Emissions (lbs/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Demolition						
Fugitive Dust Emissions	-	-	-	-	1.3	0.1
Off-Road Emissions	0.5	2.0	23.3	0.0	0.1	0.1
On-Road Emissions	0.3	8.2	2.4	0.0	0.4	0.1
Total Emissions	0.8	10.3	25.7	0.1	0.5	0.2
<i>Regional Significance Threshold</i>	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Site Preparation						
Fugitive Dust Emissions	-	-	-		4.8	1.5
Off-Road Emissions	0.5	2.0	20.9	0.0	0.1	0.1
On-Road Emissions	0.1	0.1	0.8	0.0	0.1	0.0
Total Emissions	0.6	2.1	21.7	0.0	5.0	1.6
<i>Regional Significance Threshold</i>	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No

Construction Activities	Estimated Maximum Daily Emissions (lbs/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Grading						
Fugitive Dust Emissions	-	-	-	-	1.6	0.5
Off-Road Emissions	0.4	1.6	17.8	0.0	0.1	0.1
On-Road Emissions	0.1	0.1	0.6	0.0	0.1	0.0
Total Emissions	0.4	1.6	18.4	0.0	1.8	0.6
<i>Regional Significance Threshold</i>	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Building Construction						
Fugitive Dust Emissions	-	-	-	-	-	-
Off-Road Emissions	0.3	2.2	17.5	0.0	0.0	0.0
On-Road Emissions	3.2	16.6	24.2	0.1	3.8	1.2
Total Emissions	3.5	18.8	41.7	0.1	3.9	1.2
<i>Regional Significance Threshold</i>	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Paving						
Fugitive Dust Emissions	-	-	-	-	-	-
Off-Road Emissions	0.3	1.2	17.3	0.0	0.0	0.0
On-Road Emissions	1.0	-	-	-	-	-
Total Emissions	1.3	1.2	17.3	0.0	0.0	0.0
<i>Regional Significance Threshold</i>	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Architectural Coating						
Fugitive Dust Emissions	68.2	-	-	-	-	-
Off-Road Emissions	0.5	0.3	5.5	0.0	0.6	0.6
On-Road Emissions	-	-	-	-	-	-
Total Emissions	68.7	0.3	5.5	0.0	0.6	0.6
<i>Regional Significance Threshold</i>	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Maximum Construction Day Total Emissions						
Total Emissions	75	34.3	130.3	0.3	11.8	4.3
<i>Regional Significance Threshold</i>	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No

Source: Entech 2018.

Implementation of Mitigation Measure AQ-2.1b would reduce total emissions of NO_x, PM₁₀ and PM_{2.5} generated during the maximum day construction to below SCAQMD's applicable Localized Significance Thresholds as shown in **Table 3.7-11**. Therefore, the analysis of the maximum construction day impacts related to regional air pollutants would be significant but mitigable.

TABLE 3.7-11: LOCALIZED MITIGATED POLLUTANT CONCENTRATIONS FROM CONSTRUCTION ACTIVITIES

Individual Emission Sources	Emissions (lbs/day)				
	NO _x	CO	PM ₁₀	PM _{2.5}	
Demolition	10.3	25.7	0.5	0.2	
Site Prep	2.1	21.7	5.0	1.6	
Grading	1.6	18.4	1.8	0.6	
Building Construction	18.8	41.7	3.9	1.2	
Paving	1.2	17.3	0.0	0.0	
Architectural Coating	0.3	5.5	0.6	0.6	
Maximum Construction Day Total Emissions	34.3	130.3	11.8	4.3	
SCAQMD Localized Significance Thresholds	1-acre	91	664	5	3
	2-acre	131	967	8	5
	5-acre	197	1796	15	8
Significant?	NO	NO	NO	NO	

Source: Entech, 2018

Threshold AQ-2: Violate any air quality standard, contribute substantially to an existing or projected air quality violation, or result in cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment.

Impact AQ-2.2: Operations of site-specific development permitted by the TOD Plans would generate emissions of criteria pollutants less than applicable SCAQMD thresholds for criteria pollutants for which the region is in non-attainment. Impacts would be *less than significant*.

Methodology

Long-term (i.e., operational) regional emissions of criteria air pollutants and precursors associated with the proposed TOD Plans, including mobile- and area-source emissions, were quantified using the CalEEMod computer model. Area-source emissions, which are widely

distributed and made of many small emissions sources (e.g., building heating and cooling units, landscaping equipment, consumer products, painting operations, etc.), were modeled according to the size and type of land use proposed. Mass mobile-source emissions were modeled based on the daily vehicle trips that would result from the proposed TOD Plans.

Trip generation rates for development that would be permitted by the TOD Plans were available from the Traffic Impact Analysis prepared for the TOD Plans by Iteris (Iteris, 2018). Because the transit-oriented development proposed in the TOD Plans would meet new regulatory requirements including CALGreen building standards that were not in place at the time the TOD Plan areas were originally developed, new and renovated structures that are developed pursuant to the TOD Plans would have a decreased demand for energy and consequently fewer stationary source emissions on a per square foot of building area basis although the amount of new building area proposed in the TOD Plans would result in a net increase in air pollutant emissions. Impacts of the proposed TOD Plans were determined based on comparison of the net increase in long-term operational emissions that would result from development permitted by the TOD Plans in comparison to applicable SCAQMD significance thresholds.

A significant impact would result if the emissions resulting from the net increase in development permitted by the TOD Plans would exceed the SCAQMD operations thresholds identified in **Table 3.7-5**.

Localized air quality impacts during operation of the proposed TOD Plans were also analyzed by extracting the onsite operational emissions from the CalEEMod model run for build out of the TOD Plans and evaluating those emissions against SCAQMD's applicable operational LSTs. As with construction LST analysis, only onsite- emissions are used in determining a site-specific development or infrastructure project's potential to impact local air quality for NO_x , CO, PM_{10} , and $\text{PM}_{2.5}$.

A significant impact would result if the emissions resulting from the net increase in development permitted by the TOD Plans would exceed the SCAQMD thresholds identified in **Table 3.7-6**.

The analysis discusses impacts from Toxic Air Contaminants on a qualitative basis based on compliance with applicable screening levels. If site-specific development and infrastructure projects permitted by the proposed TOD Plans would exceed the screening levels, then dispersion modeling would be undertaken to determine the potential impacts on localized receptor.

Impact Assessment

The proposed TOD Plans would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as natural gas consumption, landscaping, applications of architectural coatings, and consumer products, in addition to operational mobile emissions.

Operations emissions associated with the proposed site-specific development or infrastructure projects permitted by the TOD Plans were modeled using CalEEMod. As shown in **Table 3.7-12**, operational emissions of criteria pollutants associated with the net increase in development that would be permitted by the TOD Plans would not exceed the SCAQMD's applicable thresholds.

TABLE 3.7-12 OPERATIONAL EMISSIONS

Emission Sources	Daily Emissions (lbs/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	21.76	1.41	55.17	0.05	2.34	2.34
Energy	0.29	2.48	1.19	0.02	0.20	0.20
Mobile	0.08	2.60	6.58	0.02	1.83	0.50
Total	22.13	6.49	62.94	0.09	4.37	3.04
SCAQMD Thresholds	55	55	550	150	150	55
Significant?	No	No	No	No	No	No

Significance Conclusion for Impact AQ-2.2

Because operations of site-specific development permitted by the TOD Plans would generate emissions of criteria pollutants below applicable SCAQMD regional thresholds for criteria pollutants for which the region is in non-attainment, impacts would be less than significant.

Threshold AQ-3: Cumulatively considerable net increase in a criteria pollutant.

Impact AQ-3: The net increase in development that would be permitted by the proposed TOD Plans would increase emissions of criteria pollutants. However, because the level of emissions resulting from the TOD Plans would be less than significant, and TOD Plans are consistent with applicable regional plans aimed at

reducing emissions of air pollutants, impacts would be *less than significant*.

Methodology

Because the South Coast Air Basin is currently classified as a state nonattainment area for ozone, PM₁₀, and PM_{2.5}, cumulative development consisting of the development that would be permitted by the proposed TOD Plans along with other past, present, and probable future projects within the South Coast Air Basin as a whole could violate an air quality standard or contribute to an existing or projected air quality violation. SCAQMD's cumulative air quality impact methodology recommends that if an individual project results in air emissions of criteria pollutants (ROG, CO, NO_x, SO_x, PM₁₀, or PM_{2.5}) that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the region is in non-attainment under an applicable federal or state ambient air quality standard.

Impact Assessment

As discussed previously, the unmitigated worst-case daily construction emissions would exceed SCAQMD's construction thresholds. However, implementation of Mitigation Measures AQ-2.1a and AQ-2.1b would reduce impacts to less than significant and would therefore not be cumulatively considerable.

Operational emissions associated with vehicular traffic, energy consumption and other area sources would not exceed SCAQMD daily thresholds and would therefore not be cumulatively considerable.

Development that would be permitted by the TOD Plans would be consistent with SCAG 2016 RTP/SCS policies including the following:

- Identify regional strategic areas for infill and investment: Identify strategic opportunity areas for infill development of aging and underutilized areas and increased investment in order to accommodate future growth. This strategy makes efficient use of existing and planned infrastructure, revitalizes communities, and maintains or improves quality of life. Strategic areas are primarily identified as those with potential for transit-oriented development, existing and emerging centers, and small mixed-use areas.
- Develop "Complete Communities": Create mixed-use districts or "complete communities" in strategic growth areas through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other. Focusing a mix of land uses in strategic growth areas creates complete communities wherein most daily needs can be met within a short distance of home,

providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather traveling by automobile.

- Plan for additional housing and jobs near transit: Pedestrian-friendly environments and more compact development patterns in close proximity to transit serve to support and improve transit use and ridership. Focusing housing and employment growth in transit-accessible locations through this transit-oriented development approach will serve to reduce auto use and support more multi-modal travel behavior.

The TOD Plans provide for infill transit-oriented development that would make use of existing and planned infrastructure, revitalize the community, provide access to transit, and provide pedestrian and bicycle routes, which is intended to reduce vehicle miles travelled from development within the TOD Plan areas and would in-turn reduce vehicular related emissions.

The TOD Plans also include several sustainability features that include:

- Green Boulevards (Manchester Boulevard) that would increase pedestrian and bicycle safety and encourage non-vehicular travel.
- Alley walkways and mid-block pass-throughs would be designed to provide for increased use of pedestrian and bicycle travel.
- Drought-tolerant landscaping would be used on all streetscapes to reduce water consumption and energy required to transport water to the TOD planning areas.
- New structures would be designed to accommodate green roofs or solar installations.

Additionally, new development permitted by the proposed TOD Plans would be required to meet CALGREEN/Title 24 requirements and the City's Energy and Climate Action Plan standards that reduce energy demand from new development. Per the California Energy Commission, the CALGREEN/Title 24 standards are 25 percent more efficient than previous standards for residential construction and 30 percent better for nonresidential construction (CEC 2014). Typical CALGREEN measures include insulation; use of energy-efficient heating, ventilation and air conditioning equipment (HVAC); solar-reflective roofing materials; energy-efficient indoor and outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; incorporation of skylights, etc.

In addition, other existing regulations are likely to result in more efficient use of all types of energy, and reduction in reliance on non-renewable sources of energy within the TOD Plan areas over the next 20+ years. These include the federal Energy Independence and Security Act and the state Long Term Energy Efficiency Strategic Plan, which are designed to reduce reliance on non-renewable energy resources.

Significance Conclusion for Impact AQ-3

Because emissions resulting from the TOD Plans would be less than significant, and the TOD Plans are consistent with applicable regional plans aimed at reducing emissions of air pollutants, impacts would be less than significant, and no mitigation would be required.

Threshold AQ-4: Expose sensitive receptors to substantial pollutant concentrations.

Impact AQ-4.1: The types of uses proposed in the TOD Plans do not include those that would emit TAC emissions in appreciable quantities. However, the TOD Plans each permit new residential uses within 500 feet of a freeway. Because Mitigation Measure AQ-4.1a would ensure health risks associated with such residential development would not have a substantial adverse health effect, the impact would be reduced to less than significant. Impacts would be *significant but mitigable*.

Methodology

In an urbanized environment, air pollutant concentrations are usually most prominent along freeways and busy streets, and at busy intersections, where automotive exhausts can build up when vehicles stop and idle or slow down to approach and proceed through or make turning movements. The primary source of potential air toxics associated with operation of the proposed TOD Plans include diesel particulates from construction equipment during construction, and upon completion of construction, diesel particulates from delivery trucks (e.g., truck traffic on local streets and onsite truck idling) to the commercial, industrial, and institutional uses proposed by the TOD Plan.

CARB's Air Quality and Land Use Handbook (CARB, 2005) includes the recommendation to avoid the siting of new sensitive land uses (e.g., residences, schools) within 500 feet of freeways, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day. Thus, a significant impact would occur if a sensitive land use would be proposed within 500 feet of a freeway or a roadway with 100,000 vehicles/day.

Impact Assessment

Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: residences, long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, schools, playgrounds, childcare centers, and athletic facilities.

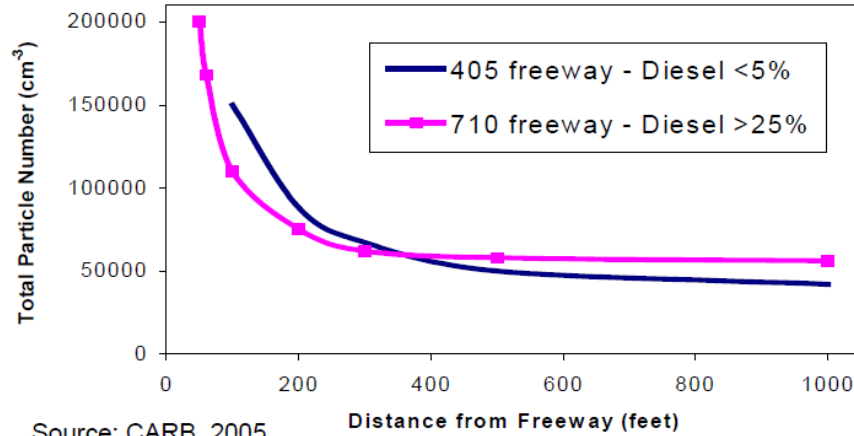
The proposed TOD Plans would generate development of new residential and non-residential employment generating uses in the TOD Plan areas that may utilize solvents, cleaners, and motor vehicle emissions. However, the types of uses proposed in the TOD Plans do not include those that would be anticipated to emit TAC emissions in appreciable quantities. In addition, any commercial or industrial use that would be a stationary source of Toxic Air Contaminant emissions would be subject to the rules and regulations of SCAQMD, including Regulation XIV (Toxics and Other Non-Criteria Pollutants), and in particular Rule 1401 (New Source Review), would require that all sources that possess the potential to emit TACs be required to obtain permits from SCAQMD. Permits are granted to these operations if they are constructed and operated in accordance with applicable regulations, including new source review standards and air toxics control measures.

The CARB Air Quality and Land Use Handbook notes that studies indicate living close to high traffic and the associated emissions may lead to adverse health effects beyond those associated with regional air pollution in urban areas. Many epidemiological studies identify an association between adverse non-cancer health effects and living or attending school near heavily traveled roadways, including a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children. The CARB Air Quality and Land Use Handbook identifies the following key health findings of studies CARB used to formulate its recommendations.

- Reduced lung function in children was associated with traffic density, especially trucks, within 1,000 feet and the association was strongest within 300 feet.
- Increased asthma hospitalizations were associated with living within 650 feet of heavy traffic and heavy truck volume.
- Asthma symptoms increased with proximity to roadways and the risk was greatest within 300 feet.
- Asthma and bronchitis symptoms in children were associated with proximity to high traffic in a San Francisco Bay Area community with good overall regional air quality.
- A San Diego study found increased medical visits in children living within 550 feet of heavy traffic.

In addition, CARB (CARB 2005) cites a Southern California study showing measured concentrations of vehicle-related pollutants, including ultra-fine particles, decreased dramatically within approximately 300 feet of the I-710 and I-405 freeways. Another study cited by CARB looked at the validity of using distance from a roadway as a measure of exposure to traffic related air pollution and showed that concentrations of traffic related pollutants declined with distance from the road, primarily in the first 500 feet, as shown in Figure 1-1 of the CARB report reproduced below.

**Figure 1-1
Decrease In Concentration of Freeway Diesel PM Emissions
With Distance**



Based on these studies, CARB's Handbook recommends avoiding siting of new sensitive land uses (e.g., residences, schools) within 500 feet of freeways, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.

Based on the projected 2040 average daily traffic (ADT) volume on roadways in the TOD Plan area, no residential uses would be located within 500 feet of an urban road with 100,000 vehicles per day. However, the Westchester/Veterans TOD Plan proposes a new residential block on the east side of Ash Avenue, approximately 400 feet east of the I-405 freeway mainline. However, Florence Ash Park, which lies between this proposed residential area and the freeway has specifically been designed as a barrier for freeway pollution with vegetated sound walls and vegetation. In addition, the parcels fronting on Manchester Boulevard are proposed to be zoned MU-C, which would allow residential uses. The closest of these parcels are within 200 feet of the freeway mainline.

Within the Crenshaw/Imperial TOD Plan area, the existing freeway frontage is currently developed with residential uses. The TOD Plan proposes changing the zoning of parcels fronting along Crenshaw Boulevard from R-3 to R-4, which would introduce new residential development as close as 200 feet from the freeway mainline.

Significance Conclusion for Impact AQ-4.1

Because the proposed TOD Plans propose development of new residential uses within 500 feet of freeways, a significant impact would result, requiring mitigation.

Mitigation Measures

Mitigation Measure AQ-4.1a: Approval of any conversion of single-family residential use to multi-family development within 500 feet of a freeway shall be permitted only if a health risk assessment demonstrates that health risks to residential receptors within the project would have no greater than a 10 in one million increase in cancer risk and no greater than a 1 in one million increase in non-cancer risk.

Conclusion with Implementation of Mitigation Measures

Because Mitigation Measure AQ-4.1a would ensure health risks associated with residential development within 500 feet of a freeway would not have a substantial adverse health effect, the impact would be reduced to *less than significant*.

Threshold AQ-4: Expose sensitive receptors to substantial pollutant concentrations.

Impact AQ-4.2: Development permitted by the proposed TOD Plans would not generate a sufficient increase in traffic volumes to produce or substantially contribute to any existing CO hotspot. Impacts would be *less than significant*.

Methodology

In the past, a qualitative screening procedure set forth in the Transportation Project-Level Carbon Monoxide Protocol (the Protocol) was used to determine whether a project would create the potential for a CO hotspot. According to the Protocol, projects may worsen air quality if they increase the percentage of vehicles in cold start modes by two percent or more; significantly increase traffic volumes (by five percent or more) over existing volumes; or worsen traffic flow, defined for signalized intersections as increasing average delay at intersections operating at level of service (LOS) E or F or causing an intersection that would operate at LOS D or better without the project, to operate at LOS E or F.

However, CO concentrations have declined dramatically in California, and most areas, including the TOD Plan areas, meet state and federal CO standards. This is attributed to the fewer number of older polluting vehicles, fewer emissions from new vehicles, and improvements in fuels. Thus, the Protocol methodology, which is focused on traffic and the percentage of traffic increase, is obsolete for determining CO impacts.

For this reason, several air districts have adopted guidelines that focus on specific criteria other than LOS and percentage traffic increase. SCAQMD has not created any new screening criteria. However, the Bay Area Air Quality Management District (BAAQMD) has identified criteria, which is applicable to the proposed TOD Plans. Because CEQA allows the Lead Agency to identify thresholds and SCAQMD does not have screening criteria, these BAAQMD screening criteria were used to determine the potential impacts related to CO hotspots and if emissions modeling is required. The BAAQMD criteria include:

1. Consistency with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans.
2. Traffic volumes at affected intersections would not be increased to more than 44,000 vehicles per hour.
3. Traffic volumes at affected intersections would not be increased to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnels, parking garages, bridge underpass, natural or urban street canyon, below-grade roadway) (BAAQMD, 2009).

For the purposes of this analysis, at any intersection exceeding the BAAQMD screening criteria, dispersion modeling would be conducted to determine the level of CO impact at the affected intersection. Where the screening values are not exceeded, the project would be determined to be less than significant with respect to localized CO impacts.

Impact Analysis

CO concentration is a direct function of motor vehicle activity (e.g., idling time and traffic flow conditions), particularly during peak commute hours and certain meteorological conditions. Under specific meteorological conditions (e.g., stable conditions that result in poor dispersion), CO concentrations may reach unhealthy levels with respect to local sensitive land uses such as residential areas, schools, and hospitals. Because of reduced speeds and vehicle queuing, “hot spots” typically occur at high traffic volume intersections.

As shown in **Table 3.7-13**, increases in AM and PM vehicle trips for the TOD Plans would not increase traffic volumes by 44,000 vehicle trips per hour. This number of trips would not produce the volume of peak hour traffic required to generate or contribute to a CO hotspot. Therefore, CO hotspots would not result from the proposed TOD Plans.

TABLE 3.7-13 AM PEAK HOUR VEHICLE TRIPS PER HOUR

	Existing Plus Project			Future Year 2040 with Project		
	AM Peak Hour	PM Peak Hour	Daily	AM Peak Hour	PM Peak Hour	Daily
Westchester/Veterans	4,764	5,478	25,090	4,722	5,512	25,579
Crenshaw/Imperial	2,694	3,335	14,626	2,716	3,344	14,709
Total Trips	7,458	8,813	39,716	7,438	8,856	40,288

Source: Entech, 2018

Significance Conclusion for Impact AQ-4.2

The proposed TOD Plans would not generate a sufficient increase in traffic volumes to produce or substantially contribute to any existing CO hotspot. Impacts would be *less than significant*.

Threshold AQ-5: Create objectionable odors affecting a substantial number of people.

Impact AQ-5: Site-specific development and infrastructure projects permitted by the proposed TOD Plans would introduce new sensitive uses into the TOD Plan areas. Because (1) no new uses are proposed within the TOD Plan areas that would emit objectionable odors that could affect a substantial number of people, (2) compliance with SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses would be required, and (3) any odors emanating from construction sites would be temporary in nature. Impacts would, therefore, be *less than significant*.

Methodology

The SCAQMD Air Quality Handbook identifies the following uses as having a potential odor issues: wastewater treatment plants, food processing plants, agricultural uses, chemical plants, composting, refineries, landfills, dairies, and fiberglass moldings. Introduction of any of these uses would be considered to be a significant impact.

Impact Assessment

The proposed TOD Plans would develop residential, commercial, institutional, and mixed-uses that do not involve the types of uses that would emit objectionable odors affecting a substantial number of people.

In addition, odors generated that could be generated by construction activities are required to comply with SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

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.

During construction of site-specific development and infrastructure projects permitted by the proposed TOD Plans, emissions from construction equipment, such as diesel exhaust, and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be temporary and localized to the construction site; and therefore, are not expected to affect a substantial number of people.

Significance Conclusion for Impact AQ-5

Because (1) no new uses are proposed within the TOD Plan areas that would emit objectionable odors that could affect a substantial number of people, (2) compliance with SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses would be required, and (3) any odors emanating from construction sites would be temporary in nature. Impacts would be less than significant. No mitigation is therefore required.

3.7.6 REFERENCES - AIR QUALITY

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3.8 GREENHOUSE GAS EMISSIONS

3.8.1 INTRODUCTION

a. Overview

This section evaluates greenhouse gas (GHG) emissions associated with the proposed TOD Plans for the Westchester/Veterans and Crenshaw/Imperial areas along with their contribution to global climate change. The environmental assessment set forth in this section is based on technical analyses prepared by Entech Consulting Group, for which modeling results are provided in Appendix D.

This section of the EIR evaluates the extent to which GHG emissions from future site-specific development permitted by the proposed TOD Plans contribute to elevated levels of GHGs in Earth's atmosphere. Given the scale of the planet's atmosphere, any individual project's GHG emissions cannot change atmospheric concentrations in any meaningful way when isolated from all other existing and future GHG emissions. Consequently, this section of the EIR evaluates whether GHG emissions from the proposed TOD Plans would contribute considerably to the cumulative impact of elevated GHG levels in the Earth's atmosphere and, by extension, contribute to global climate change and associated adverse impacts on the environment such as higher temperatures, raised sea levels, and damage to flora and fauna. This section also addresses the TOD Plans' consistency with applicable plans, policies, and public agency regulations adopted for the purpose of reducing the emissions of GHGs.

b. Definitions

Carbon Dioxide Equivalent is a metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential (GWP). Carbon dioxide equivalents are commonly expressed as "million metric tons of carbon dioxide equivalents (MTCO₂E)." The carbon dioxide equivalent for a gas is derived by multiplying the tons of the gas by the associated GWP.

$$\text{MTCO}_2\text{E} = (\text{million metric tons of a gas}) \times (\text{GWP of the gas})$$

$$\text{MMTCO}_2\text{e} = (\text{million metric tons of a gas}) \times (\text{GWP of the gas})$$

Carbon Footprint refers to the total amount of greenhouse gases that are emitted into the atmosphere each year by a person, family, building, organization, or company. A person's carbon footprint includes greenhouse gas emissions from fuel that an individual burns directly, such as by heating a home or riding in a car. It also includes greenhouse gases that come from producing the goods or services that the individual uses, including emissions from power plants that make electricity, factories that make products, and landfills where trash gets sent.

Carbon Sequestration is the process by which trees and plants absorb carbon dioxide, release the oxygen, and store the carbon.

Climate change refers to any significant change in the measures of climate lasting for an extended period of time. In other words, climate change includes major changes in temperature, precipitation, or wind patterns, among others, that occur over several decades or longer.

Emissions Inventory is an estimate of the amount of pollutants emitted into the atmosphere from major mobile, stationary, area-wide, and natural source categories over a specific period of time, such as a day or a year.

Global Climate Change is the observed increase in the average temperature of the Earth's atmosphere and oceans, along with other significant changes in climate (such as precipitation or wind) that last for an extended period of time. The term *global climate change* is often used interchangeably with the term *global warming*, but *global climate change* is preferred to *global warming* because it helps convey that GHG emissions may result in other changes, in addition to rising temperatures.

Global Warming Potential (GWP) is the relative warming of a GHG over a specified period of time as compared to carbon dioxide (GWP of 1). GWP allows for the conversion of different GHG emissions into the same emissions unit, carbon dioxide equivalents (CO₂e).

Greenhouse Gas (GHG) refers to gases that absorb and emit radiation within the thermal infrared range, which is the fundamental cause of man's contribution to the greenhouse effect. The most prevalent GHG is carbon dioxide (CO₂), along with Methane (CH₄), Nitrous oxide (N₂O), Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs), and Sulfur hexafluoride (SF₆).

Greenhouse Effect is the warming effect of the Earth's atmosphere. Light energy from the sun that passes through the Earth's atmosphere is absorbed by the Earth's surface and is radiated into the atmosphere as heat energy. The heat energy is then trapped by the atmosphere, creating a situation similar to that which occurs in a car with its windows rolled up. It is now widely accepted that the emission of carbon dioxide (CO₂) and other gases into the atmosphere increases the greenhouse effect and contributes to global warming.

Intergovernmental Panel on Climate Change (IPCC) is a scientific intergovernmental body set up by the World Meteorological Organization and the United Nations Environment Programme to provide decision makers and others interested in climate change with an objective source of information about climate change (California Air Resources Board n.d.).

Troposphere. The troposphere is the zone of the atmosphere characterized by water vapor, weather, winds, and decreasing temperature with increasing altitude.

3.8.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

The proposed TOD Plans are subject to a range of state and local plans, policies, and regulations, which are described below.

a. International and Federal Plans, Policies and Regulations

International Governmental Panel on Climate Change

In 1988, the United Nations and the World Meteorological Organization established the International Governmental Panel on Climate Change (IPCC) to assess “the scientific, technical and socioeconomic information relevant to understanding the scientific basis of risk of human-induced climate change, its potential impacts, and options for adaptation and mitigation.” The initial task for the IPCC was to prepare a comprehensive review and recommendations with respect to the state of knowledge of the science of climate change; the social and economic impact of climate change, and possible response strategies and elements for inclusion in a possible future international convention on climate. Since its inception, the IPCC has delivered five comprehensive scientific reports about climate change, with the latest (the Fifth Assessment Report) released in four parts between September 2013 and November 2014¹.

National Climate Action Plan

In June 2013, President Obama enacted a national Climate Action Plan (CAP) that consisted of a wide variety of executive actions and had three pillars discussed below.

- **Cut Carbon in America** – The CAP consists of actions to help cut carbon by deploying clean energy such as cutting carbon from power plants, promoting renewable energy, and unlocking long-term investment in clean energy innovation.
- **Prepare the United States for Impacts of Climate Change** – The CAP consists of actions to help prepare for the impacts of climate change through building stronger and safer communities and infrastructure by supporting climate resilient investments, supporting communities and tribal areas as they prepare for impacts, and boosting resilience of building and infrastructure; protecting the economy and natural resources by identifying vulnerabilities, promoting insurance leadership, conserving land and water resources, managing drought, reducing wildfire risks, and preparing for future floods; and using sound science to manage climate impacts.
- **Lead International Efforts** – The CAP consists of actions to help the United States lead international efforts through working with other countries to take action by enhancing

¹ Intergovernmental Panel on Climate Change (IPCC), *Climate Change 2014-Mitigation of Climate Change, Working Group III Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, 2014, p. 439.

multilateral engagements with major economies, expanding bilateral cooperation major emerging economies, combating short-lived climate pollutants, reducing deforestation and degradation, expanding clean energy use and cutting energy waste, global free trade in environmental goods and services, and phasing out subsidies that encourage wasteful use of fossil fuels and by leading efforts to address climate change through international negotiations.

Energy Independence and Security Act

On December 19, 2007, President Bush signed the Energy Independence and Security Act of 2007. Among other key measures, the act includes the following, which should aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by model year 2020 and direct National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

Federal Clean Air Act

The Federal Clean Air Act requires the USEPA to define national ambient air quality standards to protect public health and welfare in the U.S. Although the Act does not specifically regulate GHG emissions, the U.S. Supreme Court ruled on April 2, 2007 in *Massachusetts v. U.S. Environmental Protection Agency* that GHGs are pollutants that can be regulated under the Clean Air Act. Currently, there are no federal regulations that establish ambient air quality standards for GHGs.

The USEPA Administrator determined that atmospheric concentrations of GHGs endanger the public health and welfare within the meaning of Section 202(a) of the CAA, and on December 7, 2009, the EPA Administrator signed two findings regarding greenhouse gases under Section 202(a) of the Clean Air Act that include:

- **Endangerment Finding:** The current and projected concentrations of the six key well-mixed greenhouse gases—carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride—in the atmosphere threaten the public health

and welfare of current and future generations. The EPA also found that the combined emissions of these GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution that endangers public health and welfare under Clean Air Act Section 202(a). Subsequently, federal agencies have adopted specific GHG-related regulations and initiatives, including the following.

- **EPA and National Highway Traffic Safety Administration Standards to Cut Greenhouse Gas Emissions and Fuel Use for New Motor Vehicles:** coordinated steps to enable the production of a new generation of clean vehicles. Renewable Fuel Standard Program: transportation fuel sold in the United States is required to contain a minimum volume of renewable fuel.
- **Stationary Sources:** On May 13, 2010, the EPA set GHG emissions thresholds to define when permits under the New Source Review PSD and Title V Operating Permit programs are required for new and existing industrial facilities. This final rule “tailors” the requirements of these CAA permitting programs to limit covered facilities to the nation’s largest GHG emitters: power plants, refineries, and cement production facilities.
- **Timing of Applicability of the PSD Permitting Program to GHGs:** On March 29, 2010, the EPA completed its reconsideration of the December 18, 2008, memorandum entitled “EPA’s Interpretation of Regulations that Determine Pollutants Covered by Federal Prevention of Significant Deterioration (PSD) Permit Program” (the so-called “Johnson memo”). The final action confirmed that GHGs become covered under the PSD program on January 2, 2011, when the cars rule took effect.

In June 2014, the U.S. Supreme Court ruled that the EPA cannot classify facilities as major PSD or Title V sources based solely on its GHG emissions meeting the major source threshold. However, the Supreme Court said that the EPA could continue to require that PSD permits, required due to criteria pollutant emissions, contain Best Available Control Techniques (BACT) limits for GHG emissions. This ruling struck down Step 2 of the Tailoring Rule but kept in effect Step 1.

- **EPA and National Highway Traffic Safety Administration Standards to Cut Greenhouse Gas Emissions and Fuel Use for New Motor Vehicles:** coordinated steps to enable the production of a new generation of clean vehicles. Renewable Fuel Standard Program: transportation fuel sold in the United States is required to contain a minimum volume of renewable fuel.
- **Cause or Contribute Finding:** The combined emissions of these well-mixed greenhouse gases from new motor vehicles and new motor vehicle engines contribute to greenhouse gas pollution, which threatens public health and welfare.

These findings do not impose requirements on developments or agencies. However, this was a prerequisite for implementing emissions standards for vehicles.

Fuel Economy Standards

The federal Corporate Average Fuel Economy (CAFE) standards for vehicles in model years 2011 to 2016 (first phase of standards) and 2017 to 2025 (second phase) provide strict fuel economy requirements. These standards are projected to result in an average industry fleetwide level of 163 grams/mile of carbon dioxide (CO₂) in model year 2025, which is equivalent to 54.5 miles per gallon (mpg) if achieved exclusively through fuel economy improvements. The program is projected to:

- Cut 6 billion metric tons of GHG over the lifetimes of the vehicles sold in model years 2012-2025.
- Save families more than \$1.7 trillion in fuel costs.
- Reduce America's dependence on oil by more than 2 million barrels per day in 2025.

As part of the 2017-2025 standards rulemaking, USEPA, National Highway Traffic Safety Administration, and California Air Resources Board are to complete an evaluation of standards for vehicle model years 2022-2025.

Clean Power Plan

On August 3, 2015, President Obama and the USEPA announced the Clean Power Plan. The Clean Power Plan sets standards to reduce carbon dioxide emissions by 32 percent from 2005 levels by 2030. This Plan establishes final emissions guidelines for states to follow in developing plans to reduce GHG emissions from existing fossil fuel-fired electric generating units. Specifically, the USEPA established: (1) carbon dioxide emission performance rates representing the best system of emission reduction for fossil fuel-fired electric utility steam generating units and stationary combustion turbines; (2) state-specific CO₂ goals reflecting the CO₂ emission performance rates; and (3) guidelines for the development, submittal and implementation of state plans that establish emission standards or other measures to implement the CO₂ emission performance rates, which may be accomplished by meeting the state goals. Overall, this rule will reduce CO₂ emissions from the utility power sector (Obama, 2015).

b. State Plans, Policies, and Regulations

A variety of state-wide rules and regulations have been implemented or are in development in California that mandate the quantification or reduction of GHGs. Several gubernatorial Executive Orders establish state-wide GHG reduction goals. As a result of Senate Bill (SB) 97,

CEQA requires an analysis and mitigation of emissions of GHGs and climate change in relation to a proposed project, where a project would result in a significant increase of GHG emissions.

Legislation and Regulations

Assembly Bill 32, Global Warming Solutions Act of 2006

Assembly Bill 32 (AB 32), the Global Warming Solutions Act of 2006, requires CARB to design and implement feasible and cost-effective emission limits, regulations, and other measures to reduce statewide GHG emissions to 1990 levels by 2020. The 427 MMTCO_{2e} the statewide GHG emissions limit is approximately 28 percent below forecasted 2020 “business-as-usual” emissions of 596 MMTCO_{2e}, and about 10 percent below average annual GHG emissions during the period of 2002 through 2004 (CARB 2016).

AB 32 anticipates that the GHG reduction goals will be met, in part, through local government actions. CARB has identified a GHG reduction target of 15 percent from current levels for local governments themselves and notes that successful implementation of the plan relies on local governments’ land use planning and urban growth decisions because local governments have primary authority to plan, zone, approve, and permit land development to accommodate population growth and the changing needs of their jurisdictions.

Climate Change Scoping Plan

In December 2008, CARB approved the AB 32 Scoping Plan outlining the state’s strategy to achieve the 2020 GHG emissions limit. The Scoping Plan, developed by CARB in coordination with the Climate Action Team (CAT), provides a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce dependence on oil, diversify California’s energy sources, save energy, create new jobs, and enhance public health.

As required by AB 32, the Scoping Plan must be updated at least every five years to evaluate the mix of AB 32 policies to ensure that California is on track to meet the targets set out in the legislation. In 2014 an update to the initial Scoping Plan was developed by CARB in collaboration with the California Climate Action Team (CCAT) that built upon the initial Scoping Plan with new strategies and expanded measures and identifies opportunities to leverage existing and new funds to drive GHG emission reductions through strategic planning and targeted program investments.

As part of the updated to the Scoping Plan, emissions reductions required to meet the 2020 statewide GHG emissions limit were further adjusted. The adjustment resulted is 431 MMTCO_{2e}, which is slightly higher than the 427 MMTCO_{2e} limit of the initial Scoping Plan.

The update also adjusted the 2020 BAU forecast of GHG emissions to 509 MMTCO_{2e}, a 15 percent reduction below the estimated BAU levels was determined to be necessary to return to 1990 levels by 2020 (CARB 2014).

Scoping Plan 2014 Update

An update to the initial Scoping Plan was developed by CARB in collaboration with the CCAT pursuant to the AB 32 requirement that the Scoping Plan be updated at least every five years. The Update builds upon the initial Scoping Plan with new strategies and expanded measures and identifies opportunities to leverage existing and new funds to drive GHG emission reductions through strategic planning and targeted program investments. The first update to the AB 32 Scoping Plan was approved on May 22, 2014 by CARB.

The Update describes the state's progress towards AB 32 goals, finding that, "California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32." In addition, the Update stated, "if California realizes the expected benefits of existing policy goals (such as 12,000 MW of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80 percent below 1990 levels by 2050."

As part of the Scoping Plan update, the emissions reductions required to meet the 2020 statewide GHG emissions limit were adjusted, primarily reason based on the fact that the original Scoping Plan relied on the IPCC's 1996 Second Assessment Report (SAR) to assign the GWPs of greenhouse gases. Recently, in accordance the United Nations Framework Convention on Climate Change (UNFCCC), international climate agencies have agreed to begin using the scientifically updated GWP values in the IPCC's Fourth Assessment Report (AR4) that was released in 2007. Because CARB has begun to transition to the use of the AR4 100-year GWPs in its climate change programs, CARB recalculated the Scoping Plan's 1990 GHG emissions level with the AR4 GWPs (CARB, 2014).

Scoping Plan 2017 Update

The 2017 Scoping Plan², approved on December 14, 2017, builds on previous programs, and takes aim at the 2030 target established by the SB 32 (Pavley), which is further discussed below. The 2017 Scoping Plan outlines options to meet California's aggressive goals to reduce GHGs by 40 percent below 1990 levels by 2030. In addition, the plan incorporates the State's updated RPS

² CARB, *California's 2017 Climate Change Scoping Plan*, Accessed April 2021, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

requiring utilities to procure 50 percent of their electricity from renewable energy sources by 2030. It also raises the State's Low Carbon Fuel Standard⁷⁵ and aims to reduce emissions of methane and hydrofluorocarbons by 40 percent from 2013 levels by 2030 and emissions of black carbon by 50 percent from 2013 levels.

The 2017 Scoping Plan advises that absent conformity with a qualified GHG reduction plan, projects should incorporate all feasible GHG reduction measures and that achieving "no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development."

Renewables Portfolio Standard

California's Renewables Portfolio Standard, established in 2002 and amended in 2006 and 2011 requires retail sellers of electric services, including investor-owned utilities, publicly owned utilities, direct access providers, and community choice providers, to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by December 31, 2020. The Renewables Portfolio Standard also required 20 percent of retail sales to be sourced from renewable energy by 2013, and 25 percent of retail sales to be sourced from renewable energy by 2016.

A renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts (MW) or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location.

Advanced Clean Cars

In January 2012, pursuant to Recommended Measures T-1 and T-4 of the Scoping Plan, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.

The program also requires car manufacturers to offer for sale an increasing number of zero-emission vehicles (ZEVs) each year, including battery electric, fuel cell, and plug-in hybrid electric vehicles. In December 2012, CARB adopted regulations allowing car manufacturers to comply with California's GHG emissions requirements for model years 2017-2025 through compliance with the EPA GHG requirements for those same model years (CARB, 2012).

Executive Order B-16-2012 (March 2012) specifically focuses on reducing emissions from California's vehicle fleet and directs that California achieve a 2050 target for GHG emission reductions from the transportation sector equaling 80 percent less than 1990 levels. This would be accomplished by achieving benchmarks by 2020 and 2025 for advancements of zero-emission vehicle (ZEV) infrastructure and technology advancement.

Cap-and-Trade Program

The Scoping Plan identifies cap-and-trade as a key strategy for California to reduce its GHG emissions (CARB, 2008). A cap-and-trade program sets the total amount of greenhouse gas emissions allowable for facilities under the cap and allows covered sources, including producers and consumers of energy, to determine the least expensive strategies to comply. AB 32 required CARB to complete major rulemakings for reducing GHGs including market mechanisms by January 1, 2011. AB 32 also required the cap-and-trade program to begin in 2012. The first auction of "carbon offset credits" was held in November 2012.

Carbon offset credits are created through the development of projects, such as renewable energy generation or carbon sequestration projects, that achieve a reduction of emissions or an increase in the removal of carbon from the atmosphere from activities that are not otherwise regulated, covered under an emissions cap, or that result from government incentives. Offsets are verified reductions of emissions whose ownership can be transferred to others. As required by AB 32, any reduction of GHG emissions used for compliance purposes must be real, permanent, quantifiable, verifiable, enforceable, and additional. Offsets used to meet regulatory requirements must be quantified according to CARB-adopted methodologies, and CARB must adopt a regulation to verify and enforce the reductions. The criteria developed will ensure that the reductions are quantified accurately and are not double counted within the system (CARB, 2008).

The Cap-and-Trade Regulation provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade Program is that it does not guarantee GHG emissions reductions in any specific location or by any particular source. Rather, GHG emissions reductions are only guaranteed on a cumulative basis. Assembly Bill 398, which was approved in July 2017 continues California's Cap-and-Trade system through 2030.

Senate Bill 32

Enacted in 2016, Senate Bill (SB) 32 (Pavley, 2016) codifies the 2030 emissions reduction goal of Executive Order B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40 percent below 1990 levels by 2030.

SB 32 was coupled with a companion bill: AB 197 (Garcia, 2016). Designed to improve the transparency of CARB's regulatory and policy-oriented processes, AB 197 created the Joint Legislative Committee on Climate Change Policies, a committee with the responsibility to ascertain facts and make recommendations to the Legislature concerning statewide programs, policies and investments related to climate change. AB 197 also requires CARB to make certain GHG emissions inventory data publicly available on its web site; consider the social costs of GHG emissions when adopting rules and regulations designed to achieve GHG emission reductions; and include specified information in all Scoping Plan updates for the emission reduction measures contained therein.

Senate Bill 375

In addition to policy directly guided by AB 32, the legislature passed SB 375 (Chapter 728, Statutes of 2008), which provides for regional coordination in land use and transportation planning and funding to help meet AB 32 GHG reduction goals. SB 375 aligns regional transportation planning efforts, regional GHG emissions reduction targets, and land use and housing allocations.

SB 375 requires Regional Transportation Plans (RTPs) developed by the state's 18 metropolitan planning organizations (MPOs) to incorporate a "sustainable communities strategy" (SCS) that achieves GHG emission reduction targets set by CARB and coordinates regional housing and transportation. SB 375 thus recognizes the importance of achieving significant greenhouse gas reductions by working with cities and counties to change land use patterns and improve transportation alternatives.

Through the SB 375 process, MPOs, such as the Southern California Council of Governments (SCAG) will work with local jurisdictions in the development of sustainable communities strategies (SCS) designed to integrate development patterns and the transportation network in a way that reduces greenhouse gas emissions while meeting housing needs and other regional planning objectives. SCAG's reduction target for per capita vehicular emissions is 8 percent by 2020 and 13 percent by 2035 (CARB, 2010).

Assembly Bill 1493 of 2002 – Pavley Standards

In 2002, the California legislature adopted Assembly Bill 1493 (Chapter 200, Statutes of 2002), which required the CARB to develop and adopt, by January 1, 2005, regulations that achieve "the maximum feasible reduction of GHGs emitted by passenger vehicles and light-duty trucks and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the state."

Pursuant to AB 1493, CARB approved amendments to the California Code of Regulations (CCR) in 2004, adding GHG emissions standards to California's existing standards for motor vehicle emissions and requiring automobile manufacturers to meet fleet-average GHG emissions limits for all passenger cars, light-duty trucks within various weight criteria, and medium-duty passenger vehicle weight classes (i.e., any medium-duty vehicle with a gross vehicle weight (GVW) rating of less than 10,000 pounds and that is designed primarily for the transportation of persons) beginning with the 2009 model year.

For passenger cars and light-duty trucks with a loaded vehicle weight (LVW) of 3,750 pounds or less, the GHG emission limits for model year 2016 are approximately 37 percent lower than the limits for model year 2009 vehicles. For light-duty trucks with an LVW of 3,751 pounds to a GVW of 8,500 pounds, as well as for medium-duty passenger vehicles, GHG emissions will be reduced approximately 24 percent between 2009 and 2016.

Because the Pavley Standards would impose stricter standards than those under the Federal Clean Air Act, California applied to the US EPA for a waiver under the Clean Air Act. This waiver was initially denied in 2008 but was granted in 2009.

Senate Bill 97

SB 97 (Chapter 185, Statutes of 2007) acknowledges that climate change is a prominent environmental issue requiring analysis under CEQA and directs preparation of CEQA Guidelines to account for the effects and feasible mitigation of GHG emissions. Amendments to CEQA Guidelines to provide guidance regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents became effective March 18, 2010.

The amendments added Section 15064.4 to the State CEQA Guidelines and call for a "good-faith effort" to "describe, calculate or estimate" GHG emissions in CEQA documents. Section 15064.4 further states that the analysis of GHG impacts should include consideration of (1) the extent to which the project may increase or reduce GHG emissions, (2) whether the project emissions would exceed a locally applicable threshold of significance, and (3) the extent to which the project would comply with "regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions." Section 15064.4(b)3 states that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including plans or regulations for the reduction of greenhouse gas emissions) within the geographic area in which the project is located. Section 15064.4 does not, however, set a numerical threshold of significance for GHG emissions.

The revisions also added Section 15126.4[c] which addresses measures to mitigate GHG emissions, when such emissions are found to be significant:

Consistent with Section 15126.4(a), lead agencies shall consider feasible means, supported by substantial evidence and subject to monitoring or reporting, of mitigating the significant effects of greenhouse gas emissions. Measures to mitigate the significant effects of greenhouse gas emissions may include, among others:

- (1) Measures in an existing plan or mitigation program for the reduction of emissions that are required as part of the lead agency's decision;
- (2) Reductions in emissions resulting from a project through implementation of project features, project design, or other measures;
- (3) Off-site measures, including offsets that are not otherwise required, to mitigate a project's emissions;
- (4) Measures that sequester greenhouse gases; and
- (5) In the case of the adoption of a plan, such as a general plan, long range development plan, or plans for the reduction of greenhouse gas emissions, mitigation may include the identification of specific measures that may be implemented on a project-by-project basis. Mitigation may also include the incorporation of specific measures or policies found in an adopted ordinance or regulation that reduces the cumulative effect of emissions.

Senate Bill 350 - Clean Energy and Pollution Reduction Act of 2015

Senate Bill 350 (Chapter 547, Statutes of 2015), 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 EO B-30-15. This Act is intended to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. SB 350:

1. Increases requirements for procurement of electricity generated and sold to retail customers from eligible renewable energy resources from 33 percent to 50 percent by December 31, 2030.
2. Requires the State Energy Resources Conservation and Development Commission to establish annual targets for statewide energy efficiency savings and demand reduction that would achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas final end uses of retail customers by January 1, 2030.

Title 24 Building Energy Efficiency Standards

Title 24 of the California Code of Regulations (CCR) is the means by which California regulates energy consumption. The Title 24 Building Energy Efficiency Standards apply to energy consumed for heating, cooling, ventilation, water heating, and lighting in new residential and

nonresidential buildings. The Title 24 standards, first adopted by the CEC in 1978, are updated periodically to incorporate new energy efficiency technologies and methods.

The California Green Building Standards Code was adopted as part of Title 24 in 2008 and was last updated in 2016. The code establishes voluntary standards for planning and design for energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, sustainable site development, and internal air contaminants.

California Green Building Standards Code

In 2013, the California Building Standards Commission adopted the 2013 California Green Building Standards Code that also included the latest 2013 CALGreen Code, which became effective on January 1, 2014. The mandatory provisions of the code are anticipated to reduce 3 million metric tons (MMT) of GHG emissions by 2020, reduce water use by 20 percent or more, and divert 50 percent of construction waste from landfills. The 2013 California Energy Code (Title 24, Part 6), which is also part of the CALGreen Code (Title 24, Part 11, Chapter 5.2), became effective on July 1, 2014.

The CALGreen Code contains requirements for construction waste reduction, water conservation, and natural resource conservation. The Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building. The code also requires building commissioning, which is a process for the verification that all building systems, such as heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

The CALGreen Code provides standards for bicycle parking, carpool/vanpool/electric vehicle spaces, light and glare reduction, grading and paving, energy efficient appliances, renewable energy, graywater systems, water efficient plumbing fixtures, recycling and recycled materials, pollutant controls (including moisture control and indoor air quality), acoustical controls, storm water management, building design, insulation, flooring, and framing, among others.

Executive Orders

Executive orders do not have the same status as a law because in California's constitutional system, it is the Legislature, not the Governor, who is entrusted with the role of developing statewide laws. Executive orders are, however, important in that they address management and administrative issues such as regulatory reform and environmental impacts, and intergovernmental coordination.

Executive Order S-3-05 – State-Wide Emission Reduction Targets

Executive Order S-3-05 was established by Governor Arnold Schwarzenegger in June 2005. Executive Order S-3-05 establishes state-wide emission reduction targets through the year 2050, as follows:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels³.

Executive Order B-30-15

In April 2015, Governor Brown signed Executive Order B-30-15, establishing an interim state-wide GHG reduction target of 40 percent below 1990 levels by 2030. This Executive Order also directed all state agencies with jurisdiction over GHG-emitting sources to implement measures designed to achieve the new interim 2030 goal, as well as the pre-existing, long-term 2050 goal identified in Executive Order S-3-05. Additionally, the Executive Order directed CARB to update its Scoping Plan to address the 2030 goal. In the coming months CARB is expected to develop statewide inventory projection data for 2030, as well as commence its efforts to identify reduction strategies capable of securing emission reductions that allow for achievement of the new interim goal established in Executive Order B-30-15.

The Legislature adopted SB 32 to enact the Executive Order's 2030 goal.

Executive Order S-1-07

Executive Order S-1-07, signed by then-Governor Arnold Schwarzenegger in 2007, proclaimed that the transportation sector is the main source of GHG emissions in California, at over 40 percent of statewide emissions. The order established a goal of reducing the carbon intensity of transportation fuels sold in California by a minimum of 10 percent by 2020. It also directed CARB to determine whether this Low Carbon Fuel Standard could be adopted as a discrete, early-action measure after meeting the mandates in AB 32.

CARB adopted the Low Carbon Fuel Standard on April 23, 2009. The regulation is expected to increase the production of biofuels, including those from alternative sources such as algae, wood, and agricultural waste. In addition, the Low Carbon Fuel Standard is expected to increase the availability of plug-in hybrid, battery electric, and fuel-cell power motor vehicles.

³ The Legislature declined to include the Executive Order's 2050 goal in AB 32 and SB 375.

c. Regional Plans, Policies, and Regulations

Southern California Association of Governments

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted “Connect SoCal,” the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Connect SoCal integrates transportation planning with economic development and sustainability planning to comply with state greenhouse gas (GHG) emissions reduction goals, such as Senate Bill 375.

Southern California will grow from 9 million people, 6 million households, and 8 million jobs in 2020 to 22.5 million people, 7.6 million households, and 10 million jobs in 2045. During that time, transportation infrastructure will need to substantially expand while also meeting the GHG emissions-reduction targets set by the California Air Resources Board.

SCAG is empowered by state law to assess regional housing needs and provide a specific allocation of housing needs for all economic segments of the community for each of the region’s counties and cities. The determination of each city’s and county’s share of regional housing needs that is required by law to be reflected in municipal General Plan housing elements is based on the growth projections of the RTP/SCS.

Connect SoCal projects that Inglewood will grow from a population of 120,800 in 2020 to 129,000 people in 2040. Between 2020 and 2040, Connect SoCal projects that the number of households in Inglewood will grow from 40,400 to 43,300, while local employment opportunities will increase from 9,900 to 10,900.

The following strategies are intended to be supportive of implementing the regional Sustainable Communities Strategy. Several are directly tied to supporting related GHG reductions while others support the broader goals of Connect SoCal:

Focus Growth Near Destinations & Mobility Options

- Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.
- Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.
- Plan for growth near transit investments and support implementation of first/last mile strategies.

- Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.
- Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.
- Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).
- Identify ways to “right size” parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)

Promote Diverse Housing Choices

- Preserve and rehabilitate affordable housing and prevent displacement.
- Identify funding opportunities for new workforce and affordable housing development.
- Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply.
- Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.

Leverage Technology Innovations

- Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space.
- Improve access to services through technology – such as telework and telemedicine as well as other incentives such as a “mobility wallet,” an app-based system for storing transit and other multi-modal payments.
- Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation.

Support Implementation of Sustainability Policies

- Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.
- Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations.
- Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or

other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space.

- Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies.
- Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region.
- Continue to support long range planning efforts by local jurisdictions.
- Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy.

Promote a Green Region

- Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.
- Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.
- Integrate local food production into the regional landscape.
- Promote more resource efficient development focused on conservation, recycling, and reclamation.
- Preserve, enhance, and restore regional wildlife connectivity.
- Reduce consumption of resource areas, including agricultural land.
- Identify ways to improve access to public park space.

Connect SoCal identifies Priority Growth Areas (PGAs) that follow the principles of “center-focused placemaking,” including “locations where many Connect SoCal strategies can be fully realized.” Connect SoCal identifies several types of PGAs – Job Centers, Transit Priority Areas, High-Quality Transit Areas, Neighborhood Mobility Areas, Livable Corridors, and Spheres of Influence – that account for only 4 percent of region’s total land area, while accommodating 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2016 and 2045.

The purpose of this more compact form of regional development is to:

- Reduce travel distances;
- Increase mobility options;
- Improve access to workplaces; and

- Conserve the region's resource areas.

Although the region will see benefits from infill development, Connect SoCal also encourages to actively acknowledge and plan for potential impacts such as displacement of existing residents.

The Westchester/Veterans and Crenshaw/Imperial TOD areas are identified as Transit Priority Areas (TPAs), which are Priority Growth Areas that are within one half mile of existing or planned 'major' transit stops⁴. Connect SoCal envisions Transit Priority Areas as areas where "TOD can be realized – where people can live, work and play in higher density, compact communities with ready access to a multitude of safe and convenient transportation alternatives." Connect SoCal states that focusing regional growth in areas with planned or existing transit stops is "key to achieving equity, economic, and environmental goals. Infill within TPAs can reinforce the assets of existing communities, efficiently leveraging existing infrastructure and potentially lessening impacts on natural and working lands. Growth within TPAs supports Connect SoCal's strategies for preserving natural lands and farmlands and alleviates development pressure in sensitive resource areas by promoting compact, focused infill development in established communities with access to high-quality transportation." Transit Priority Areas comprise less than 1 percent of Southern California's land area, while accommodating approximately 30 percent of projected new households within Southern California between 2020 and 2045.

South Coast Air Quality Management District

Interim GHG Significance Thresholds

The South Coast Air Quality Management District (SCAQMD) released draft guidance regarding interim CEQA GHG significance thresholds in 2008. In its October 2008 document, the SCAQMD proposed the use of a percent emission reduction target (e.g., 30 percent) to determine significance for commercial/residential projects that emit greater than 3,000 metric tons (MT) per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 MT per year for stationary sources for industrial projects where the SCAQMD is lead agency. The SCAQMD has not yet adopted any of the recommended thresholds; however, the intent is to provide thresholds that capture 90 percent of development projects and thereby require implementation of GHG mitigation measures.

⁴ A 'major' transit stop is defined as a site containing an existing or planned rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

Policy on Global Warming and Stratospheric Ozone Depletion and General Guidance

In October 2008, the South Coast Air Quality Management District (SCAQMD) released draft guidance regarding interim CEQA GHG significance thresholds. SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 MT of GHG per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is the Lead Agency.⁸⁴

However, SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects). While it formed a GHG Significance Threshold Working Group to evaluate potential GHG significance thresholds, it failed to reach consensus; as a result, the SCAQMD has never adopted a formal threshold of significance.

SCAQMD adopted a “Policy on Global Warming and Stratospheric Ozone Depletion” on April 6, 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the Air Quality Management Plan (AQMP). In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy to include the following directives:

- Phase out the use and corresponding emissions of chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;
- Phase out the large quantity use and corresponding emissions of hydrochlorofluorocarbons by the year 2000;
- Develop recycling regulations for hydrochlorofluorocarbons (e.g., SCAQMD Rules 1411 and 1415);
- Develop an emissions inventory and control strategy for methyl bromide; and
- Support the adoption of a California GHG emission reduction goal.

d. Local Plans, Policies, and Regulations

City of Inglewood Energy and Climate Action Plan

The City of Inglewood adopted the Inglewood Energy and Climate Action Plan (ECAP) in March 2013. The Inglewood ECAP does not provide CEQA thresholds of significance but provides a roadmap for achieving the state’s goal for GHG emission reduction targets and encourages the City to grow in a more sustainable manner. The ECAP contains the following:

- **Emissions Inventory:** Expands the City’s 1990, 2005, and 2007 greenhouse gas inventory to include an inventory of 2010 emissions. The ECAP also includes a year 2010 inventory of electricity and natural gas consumed.
- **Emissions Reduction Target/Goal:** Establishes a 2020 emissions reduction target of 15 percent below 2005 levels and a 2035 emission reduction goal of 32.5 percent below 2005 levels, as shown in Table 3 of the ECAP, below.

TABLE 3 : GREENHOUSE GAS REDUCTION TARGET ANALYSIS OF ECAP STRATEGIES

	2020 REDUCTION POTENTIAL MTCO ₂ E	2020 REDUCTION POTENTIAL (MTCO ₂ E/SP)	2035 REDUCTION POTENTIAL MTCO ₂ E	2035 REDUCTION POTENTIAL (MTCO ₂ E/SP)
Lead by Example	1,575	0.01	2,392	0.02
Increase Energy Efficiency	1,908	0.01	9,146	0.06
Support Renewable Energy	43,177	0.29	60,747	0.40
Improve Transportation Options	83,001	0.57	104,554	0.68
Reduce Consumption and Waste	1,281	0.01	2,156	0.01
Total Reductions from Building Strategies	130,942	0.89	178,996	1.16
Projected BAU Emissions	626,748	4.27	678,283	4.41
Adjusted BAU with ECAP Measures	495,806	3.38	499,288	3.25
Proposed Greenhouse Gas Emissions Target/Goal	519,273	3.53	412,364	2.68
Reduction Beyond Target (2020) and Emissions Gap (2035)	23,467	0.16	-86,924	-0.57

- **Emission Reduction Strategies:** The ECAP contains energy and greenhouse gas emissions reduction strategies. Particular attention is provided to budget-neutral measures that will reduce the community-wide energy consumption and greenhouse gas emissions in order to meet the statewide emissions targets identified in the ARB’s Scoping Plan and Executive Order S-03-05.
- **Implementation Program:** Identifies the timeline for implementing each strategy, relative cost, and any additional analysis and/or legislative action needed.
- **Streamlined CEQA Review:** The ECAP serves as a tiering document for the streamlined review of project-level greenhouse gas emissions under CEQA for projects proposed within the City’s jurisdiction.

Envision Inglewood

The City, through Envision Inglewood⁵, is developing a comprehensive transportation infrastructure plan and multimodal improvement program to connect the City's activity centers directly to the regional Metro Rail and Bus System, implement state-of-the-art transportation technologies and traffic demand management strategies to improve both daily and event commutes, and overall traffic management, reduce vehicular trips and enhance pedestrian, bike, and other transit amenities designed to improve air quality, and reduce overall greenhouse gas emissions, and support the economic revitalization already underway while simultaneously developing neighborhood protection programs.

As noted in the City's plan, Inglewood is committed to providing world class transportation connections to its new State-of-the-art sports and entertainment centers and is working diligently to define and propose a last-mile fixed guideway transit connector. Mobility and direct transit access to the City's new activity centers are critical top priorities, especially given local and regional goals to increase transportation choices, reduce greenhouse gas emissions, improve air quality and human health, and encourage sustainable development patterns.

Transit and Intercity Rail Capital Program

The City applied for and received a Transit and Intercity Rail Capital Improvement Program grant from the California State Transportation Agency. The goal of this program is to provide monies to fund transformative capital improvements that modernize California's intercity rail, bus, ferry, and rail transit systems to achieve the following objectives:

- Reduction in greenhouse gas emissions;
- Expand and improve rail service to increase ridership;
- Integrate the rail service of the State's various rail operations, including integration with the high-speed rail system; and
- Improve safety.

3.8.3 ENVIRONMENTAL SETTING

Gases that trap heat in the atmosphere are called GHGs. The major concern with GHGs is that increases in their concentrations are causing global climate change, which is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, the vast majority in the scientific

⁵ Envision Inglewood. <http://envisioninglewood.org/>. Accessed April 19, 2021.

community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different warming potential and CO₂ is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO₂ equivalents (CO_{2e}). For example, SF₆ is a GHG commonly used in the utility industry as an insulating gas in circuit breakers and other electronic equipment. SF₆, while comprising a small fraction of the total GHGs emitted annually world-wide, is a much more potent GHG with 22,800 times the global warming potential as CO₂. Therefore, an emission of one metric ton (MT) of SF₆ could be reported as an emission of 22,800 MT of CO_{2e}. Large emission sources are reported in million metric tons (MMT) of CO_{2e}. The principal GHGs are described below, along with their global warming potential.

Carbon dioxide: Carbon dioxide (CO₂) is an odorless, colorless, natural greenhouse gas. Carbon dioxide's global warming potential is 1. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood.

Methane: Methane is a flammable gas and is the main component of natural gas. It has a lifetime of 12 years, and its global warming potential is 28. Methane is extracted from geological deposits (natural gas fields). Other sources are landfills, fermentation of manure, and decay of organic matter.

Nitrous oxide: Nitrous oxide (also known as "laughing gas") is a colorless greenhouse gas that has a lifetime of 121 years, and its global warming potential is 265. Sources include microbial processes in soil and water, fuel combustion, and industrial processes.

Sulfur hexafluoride: Sulfur hexafluoride is an inorganic, odorless, colorless, and nontoxic, nonflammable gas that has a lifetime of 3,200 years and a high global warming potential of 23,500. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas.

Perfluorocarbons: Perfluorocarbons have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000- and 50,000-years global warming potentials range from 7,000 to 11,000. Two main sources of perfluorocarbons are primary aluminum production and semiconductor manufacturing.

Hydrofluorocarbons: Hydrofluorocarbons are a group of greenhouse gases containing carbon, chlorine, and at least one hydrogen atom. Global warming potentials range from 100 to 12,000. Hydrofluorocarbons are synthetic manmade chemicals used as a substitute for chlorofluorocarbons in applications such as automobile air conditioners and refrigerants.

Some of the potential effects in California of global warming may include loss in snowpack, sea level rise, more extreme heat days per year, more high ozone days, more forest fires, and more drought years (CARB, 2009). Secondary effects that are projected to result from global warming include impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity.

Globally, climate change has the potential to impact numerous environmental resources through potential, though uncertain, impacts related to future air temperatures and precipitation patterns. The projected effects of global warming on weather and climate are likely to vary regionally, but are expected to include the following direct effects (IPCC, 2001):

- Higher maximum temperatures and more hot days over nearly all land areas;
- Higher minimum temperatures, fewer cold days and frost days over nearly all land areas;
- Reduced diurnal temperature range over most land areas;
- Increase of heat index over land areas; and
- More intense precipitation events.

While the possible outcomes and the feedback mechanisms involved are not fully understood and much research remains to be done, the potential for substantial environmental, social, and economic consequences over the long term may be great.

GHGs are produced by both direct and indirect emissions sources. Direct emissions include consumption of natural gas, heating and cooling of buildings, landscaping activities and other equipment used directly by land uses. Indirect emissions include the consumption of fossil fuels for vehicle trips, electricity generation, water usage, and solid waste disposal.

California produced 459 gross MMTCO_{2e} in 2013 (CARB, 2014a). Combustion of fossil fuel in the transportation sector was the single largest source of California's GHG emissions in 2012, accounting for 36 percent of total GHG emissions in the state (CARB, 2014a). This sector was followed by the electric power sector (including both in-state and out-of-state sources) (21 percent) and the industrial sector (19 percent) (CARB, 2014a).

The Inglewood Energy and Climate Action Plan (ECAP) reported that in 2010, total greenhouse gas emissions in Inglewood were 594,273 MT CO_{2e}, as shown in **Table 3.8-1**. Based on Inglewood's 2010 population, this amounts to 5.35 MT CO_{2e} per capita or 4.11 MT CO_{2e} per

service population. Service population equals the total number of residents and employees within a development. In comparison, California's per capita emissions rate in 2009 was 12.3 MT CO_{2e}; however, one reason this figure may be higher than in Inglewood is the substantial amounts of industrial agricultural activity that occurs statewide. Inglewood's per capita emissions is comparable to other South Bay cities with similar proportions of source emissions. For example, in 2007, per capita emissions in Hawthorne were 4.7 MT CO_{2e} and in Gardena, 7.3 MT CO_{2e}.

The transportation sector was responsible for the majority (54%) of Inglewood's GHG emissions. Other major sources of GHG emissions were residential (21%), commercial (16%), and industrial (4%) uses.

TABLE 3.8-1: COMMUNITY GHG EMISSIONS BY SECTOR (EXISTING AND PROJECTED)

	1990	2005	2007	2010	2020	2035
Community-wide Greenhouse Gas Emissions (MT CO_{2e})						
Transportation	361,061	320,254	311,854	322,042	327,998	337,352
Residential	107,924	124,872	123,062	122,429	134,843	156,574
Commercial & Municipal	87,880	97,176	99,458	95,261	106,041	124,749
Industrial	42,514	34,940	31,272	26,100	26,376	26,830
Solid Waste	27,668	19,855	16,841	16,448	16,782	17,555
Water	15,068	13,813	13,272	11,993	14,707	15,044
TOTAL	642,115	610,910	595,758	594,273	626,748	678,283
Population, Employment, and Per Capita / Per Service Area Population Emissions						
Population	109,602	112,417	111,428	109,673	111,900	117,056
Employment	40,800	32,683	33,656	31,303	35,000	36,700
Service Area Population (pop. + emp.)	140,402	145,100	145,084	140,976	146,900	153,756
Emissions Per Capita (MT CO _{2e} /pop.)	5.86	5.43	5.35	5.42	5.60	5.79
Emissions per Service Area Population (MT CO _{2e} /service area pop.)	4.57	4.21	4.11	4.22	4.27	4.41

Source: Inglewood Energy and Climate Action Plan, March 25, 2013.

The City's Community-wide emissions were categorized in six sectors:

- **Transportation** includes emissions from vehicles traveling (wholly or partially) within the City, and emissions from operating off-road vehicles and equipment (e.g., lawn and garden equipment, construction equipment, industrial equipment, and light commercial equipment).
- **Residential Energy** includes emissions from electricity and natural gas consumption in residential buildings.

- **Commercial/Municipal Energy** includes emissions from electricity and the on-site combustion of natural gas and fuel use in nonresidential buildings and city facilities (including outdoor lighting).
- **Industrial Energy** includes emissions from electricity and the on-site combustion of natural gas and fuel use in industrial buildings and facilities.
- **Solid Waste** includes emissions from solid waste that is generated in the community and sent to landfills.
- **Water** includes emissions from the electricity used to source, treat, and deliver imported water in the community that is not accounted for in the community utility data.

As shown, the transportation sector was the largest contributor to the most recent inventory (2010) at over 54 percent of the total. Residential Energy consumption is the second-largest contributor to emissions at 20.6 percent of the total, followed by Commercial/Municipal Energy (16 percent), Industrial Energy (4.4 percent), Solid Waste (2.8 percent), and Water (2 percent).

The Inglewood ECAP noted that GHG emissions in Inglewood are expected to rise significantly if no reduction strategies are implemented. Inglewood's greenhouse gas emissions are projected to increase 14 percent from 594,273 MT CO_{2e} in 2010 to 678,283 MT CO_{2e} in 2035, with per capita emissions rising 8 percent to 5.79 MT CO_{2e} and per service area population emissions rising 7 percent to 4.41 MT CO_{2e}. Specific GHG reduction measures included in the adopted ECAP are discussed in Section 3.8.5, below.

3.8.4 SIGNIFICANCE CRITERIA

Criteria outlined in CEQA Guidelines were used to determine the level of significance of greenhouse gas emission impacts. Appendix G of state CEQA Guidelines indicates that a project would have a significant effect if it were to:

- GHG-1 Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- GHG-2 Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

3.8.5 IMPACTS AND MITIGATION MEASURES

Threshold GHG-1: Generation of Greenhouse Gas Emissions

Impact GHG-1: The increased development permitted by the proposed TOD Plans would generate emissions of GHGs from construction and from traffic, energy use, and other operations of new site-specific developments. However, GHG emissions from buildout of the TOD Plans, including construction and operational

emissions would be substantially less than 40 percent below 1990 per service population emissions for the City of Inglewood, which is reflective of the increased development intensity in transit-oriented mixed-use settings provided by the TOD Plans, along with the TOD Plans' proposed improvements to maximize bicycling and walking. The resulting impact would be *less than significant*.

Methodology

Although GHG emissions from a single site-specific development project or from as large as the Westchester/Veterans and Crenshaw/Imperial TOD Plans would not cause or measurably affect global climate change, GHG emissions from multiple projects throughout the world could result in a cumulative impact with respect to global climate change. Therefore, analyses presented in this section of the Draft EIR evaluate the GHG emissions associated with construction and operation-related activities in relation to future site-specific development pursuant to the TOD Plan's direct and indirect contribution to the cumulative environmental effects of GHG emissions.

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a qualified local plan for reducing GHG emissions. Neither have SCAQMD, OPR, CARB, CAPCOA, or any other State or regional agency adopted a numerical significance threshold for assessing the significance of GHG emissions.

Consistent with the 2017 Scoping Plan Update, the TOD Plans would have a significant impact if they would generate GHG emissions greater than 40 percent below 1990 per service population emissions for the City of Inglewood.

Construction Impacts Methodology

SCAQMD recommends the use of CalEEMod for estimating construction and operational emissions associated with land use development projects. CalEEMod incorporates the most recent versions of Emission Factor (EMFAC) and Off-Road Emissions (OFF-ROAD) models developed by CARB. CalEEMod estimates the emissions of CO₂, CH₄, and N₂O as well as the resulting total CO_{2e} emissions associated with construction related GHG sources such as off-road construction equipment, material delivery trucks, soil haul trucks, and construction worker vehicles. Because CalEEMod currently uses IPCC's 1996 SAR to assign the GWPs for CH₄ and N₂O, the emissions for these two GHGs were taken from the CalEEMod outputs and converted to CO_{2e} emissions outside of CalEEMod using the updated GWPs from IPCC's AR4. Based on SCAQMD's 2008 Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG)

Significance Threshold document, SCAQMD recommends that for construction GHG emissions the total emissions for a site-specific development or infrastructure project be amortized over a 30-year period and added to its operational emission estimates (SCAQMD, 2008).

Short-term construction-generated emissions of GHG's associated with the proposed TOD Plans were modeled using the California default values where specific information was not available, and reasonable assumptions based on the anticipated build out of the TOD Plans and default model settings were used to estimate criteria air pollutant and ozone precursor emissions. GHG emissions from construction activities are typically associated with emissions from construction vehicles and equipment.

The timing of construction of site-specific development and infrastructure projects permitted by the proposed TOD Plans would be in response to market conditions, developer applications for new land use, and infrastructure improvement needs over time. The analysis of GHG emissions is based on a 20-year buildout period during which the "maximum construction day" (**Table 3.8-4**) would represent approximately 10 percent of the proposed buildout of the TOD Plans. It was also assumed that there would be multiple construction site-specific development projects occurring at any given time during any given year and therefore construction phases of individual site-specific development projects would overlap. Modeling input and output files are provided in Appendix D.

Operations Impacts Methodology

Operational emissions of GHGs, including GHGs generated by direct and indirect sources, are estimated according to the recommended methodologies from SCAQMD described above. Direct sources include emissions such as vehicle trips, natural gas consumption, and landscape maintenance. Indirect sources include off-site emissions occurring as a result of the TOD Plans' operations such as use of electricity, water consumption, and solid waste disposal. The direct and indirect emissions generated during the TOD Plans' operations were estimated using CalEEMod.

Similar to the calculation of the construction related GHG emissions, the operational emissions of CH₄ and N₂O were extracted from the CalEEMod output file and converted to CO_{2e} emissions using the GWPs from IPCC's AR4. Modeling was based on TOD Plans data (e.g., size and type of proposed uses) and vehicle trip information from the Traffic Impact Analysis prepared for the TOD Plans by Iteris (Iteris, 2018). Annual operational GHG emissions associated with the TOD Plans were calculated using CalEEMod for the net increase in in land uses proposed by the TOD Plans. Thus, the GHG emissions calculated for the TOD Plans represent the net increase in operational emissions that would result build out of the TOD Plans. In turn, calculation of GHG emissions efficiency is based on analysis of the net increases

in GHG emissions and the net increase that would occur in service population within the TOD Plan areas.

Impact Assessment

Construction Emissions

Temporary construction activities would occur intermittently at numerous different sites within the TOD Plan areas over an assumed 20-year build out period. Construction of these site-specific development projects would generate GHG emissions contributing to global climate change impacts. Construction activities would result in the emission of GHGs from equipment exhaust, construction-related vehicular activity, and construction worker automobile trips. Daily emission levels for construction activities would vary depending on the number and type of equipment, duration of use, operation schedules, and the number of construction workers.

Total estimated construction related GHG emissions for the proposed TOD Plans would equal approximately 1,265.6 MMTCO₂e. This would equal approximately 42.19 MT CO₂e when amortized over 30 years per SCAQMD methodology.

Operational Emissions

Area and indirect sources of GHG primarily include electricity and natural gas consumption, water transport (energy used to pump water), and solid waste generation from new land uses proposed by the TOD Plans. GHG emissions from electricity consumed within the TOD Plan areas would be generated off-site at electrical generation plants. GHG emissions from water transport are also indirect emissions resulting from the energy required to transport water from its source. In addition, the new development permitted by the proposed TOD Plans would generate GHG emissions from motor vehicle trips.

The estimated the operational GHG emissions that would be generated from site-specific development projects permitted by the TOD Plans are shown in **Table 3.8-2**. Additionally, in accordance with SCAQMD's recommendation, amortized construction related GHG emissions are added to the operational emissions estimate in order to determine the total annual GHG emissions. The annual operational GHG emissions associated with the TOD Plans reflect the net increase in emissions that would occur as the result of site-specific development projects permitted by the TOD Plans.

As shown in **Table 3.8-2**, the proposed TOD Plans' total net annual GHG emissions would be approximately 19,472.57 MT CO₂e per year (detailed calculations are included in Draft EIR Appendix D). Given a service population (total of residents at full occupancy and full employment at build out) increase of 16,973, annual per service population GHG emissions for

the proposed TOD Plan would be 1.70 MTCO₂e/year. This is substantially below SCAQMD's 2035 proposed efficiency level of 4.1 MTCO₂e/year and is reflective of the increased development intensity in mixed-use settings provided by the TOD Plans, along the TOD Plans' transit orientation and the proposed improvements to maximize bicycling and walking within the Westchester/Veterans and Crenshaw/Imperial areas.

TABLE 3.8-2 ESTIMATED CONSTRUCTION AND OPERATIONS-RELATED GHG EMISSIONS

Emission Source	Estimated Emissions CO₂e (MT/yr)
Construction	
Annual Mitigated Construction (Amortized over 30 years)	42.19
TOD Plans Operations	
Area Sources	910.40
Energy Consumption^a	11,130.75
Mobile Sources	2,098.88
Solid Waste	1,373.70
Water Consumption^b	2,692.50
Total (Construction and Operational Emissions)	19,472.57
Service Population	16,973
CO₂e/ Service Population – TOD Plans	1.15
Citywide 1990 MTCO₂e Emissions per Service Population	4.57
Significant Threshold (40% below Citywide 1990 MTCO₂e Emissions per Service Population)	2.68
Significant Impact?	No

NOTES:

- ^a The energy related GHG emissions, as estimated by CalEEMod, use 2008 Title 24 energy usage rates. However, according to the CEC, nonresidential buildings that are constructed in accordance with the 2013 Building and Energy Efficiency Standards would be 25 percent more energy efficient than the 2008 Standards. As such, this additional reduction in energy consumption was accounted for in the estimated GHG emissions associated with energy consumption.
- ^b GHG emissions reductions associated with water use resulting from compliance with CALGreen requirements, which requires a minimum 20 percent reduction in indoor water use and the provision of irrigation controllers for outdoor water use, were accounted for in CalEEMod model run.

Significance Conclusion for Impact GHG-1

The proposed TOD Plans would result in the emissions of GHGs from construction and from traffic, energy use, and other operations of new site-specific developments. However, GHG emissions from buildout of the TOD Plans, including construction and operational emissions would be substantially less than 40 percent below 1990 per service population emissions for the City of Inglewood. The resulting impact would be less than significant.

Threshold GHG-2: Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

Impact GHG-2: Site-specific development projects permitted by the proposed TOD Plans would result in an increase in GHG emissions. However, these emissions would be substantially below SCAQMD's proposed efficiency threshold, which indicates compliance with statewide GHG emissions reduction goals. Per service population GHG emissions would also be less than half of Inglewood's citywide 1990 per service population GHG emissions, further indicating compliance with statewide GHG emissions reduction goals. In addition, the TOD Plans provide for enhanced access to transit and improved pedestrian and bicycle facilities and would implement the provisions of the City's ECAP. Thus, impacts would be *less than significant*.

Methodology

A significant impact would occur if the proposed TOD Plans would fail to implement applicable GHG reduction measures set forth in the City's ECAP. In addition, a significant impact would occur if the TOD Plans would generate GHG emissions greater than 40 percent below 1990 per service population emissions for the City of Inglewood, which represents the emissions reduction target set forth in CARB's 2017 Scoping Plan Update.

Impact Assessment

Increased GHG emissions would result from the increase in population and employment, and the resulting use of electricity, water, and fuels and generation of wastewater and solid waste, the proposed TOD Plans. Collectively however, the standards, policies, and programs that would be implemented site-specific development projects permitted by the TOD Plans would substantially reduce GHG emissions on a per service population basis within the TOD Plan areas.

The Westchester/Veterans and Crenshaw/Imperial TOD Plans propose transit-oriented mixed-use development adjacent to two Metro light rail lines along with improvements to enhance bicycle and pedestrian mobility. As indicated in Section 3.1.2 e, because the Westchester/Veterans and Crenshaw/Imperial areas are within one-half mile of major transit stops and the TOD Plans are (1) mixed use in character and (2) designed to maximize use of transit, the TOD Plans will substantially reduce VMT per service population in the area. Additionally, all site-specific development projects permitted by the TOD Plans would be required to meet, at minimum, the standards within the CALGreen Building requirements. This reduction in VMT

and increase building energy efficiency are reflected in GHG emissions per service population that are substantially below SCAQMD's proposed threshold for 2035 and also substantially below the Inglewood's citywide 1990 GHG emissions.

This reduction in GHG emissions per service population is consistent with the intent of the AB 32 Scoping Plan as the TOD Plans will result in per service population GHG emissions reductions substantially below statewide, regional, and local target to help meet legislative targets. In addition, the TOD Plan is consistent with SB 375, which is focused on changing land use patterns and improving transportation alternatives. Therefore, the proposed TOD Plans are consistent with the state and regional GHG reduction plan, policies, and regulations that are described above.

In addition, the City of Inglewood Energy and Climate Action Plan (ECAP) was adopted to achieve community-wide energy consumption and greenhouse gas emissions reductions. The ECAP includes energy and greenhouse gas emissions reduction strategies and a streamlined CEQA review process for development projects to demonstrate compliance with the City's GHG reduction strategies, which is based on a point system whereby each standard has a point value that reflects its effectiveness to reduce GHG.

The ECAP sets forth a checklist of measures that a project may choose to implement in order to reduce greenhouse gas emissions. For a project to be fully compliant with the ECAP, an applicant must select measures that have an associated point total of 20 points. Site-specific development projects permitted by the TOD Plans would be required meet these conditions through design and regulatory compliance. Therefore, the TOD Plans would not conflict with the ECAP, but would work to reduce GHG emissions and assist in implementing the ECAP measures.

Significance Conclusion for Impact GHG-2

The proposed TOD Plans would result in an increase in GHG emissions. However, these emissions would be substantially below SCAQMD's proposed efficiency threshold, which indicates compliance with statewide GHG emissions reduction goals. Per service population GHG emissions would also be less than half of Inglewood's citywide 1990 per service population GHG emissions, further indicating compliance with statewide GHG emissions reduction goals. In addition, the TOD Plans provide for enhanced access to transit and improved pedestrian and bicycle facilities and would implement the provisions of the City's ECAP. Thus, impacts would be less than significant.

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USEPA Transportation and climate CAFÉ regulations and standards.

<https://www3.epa.gov/otaq/climate/regulations.htm>

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3.9 ENERGY RESOURCES

3.9.1 INTRODUCTION

This section assesses the significance of the use of energy, including electricity, natural gas, and gasoline and diesel fuels, that would result from the proposed TOD Plans. This section discusses existing energy use patterns and examines whether the proposed Specific Plan would result in the consumption of large amounts of fuel or energy or use of such resources in a wasteful manner.

3.9.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

The proposed TOD Plans are subject to a range of state and local plans, policies, and regulations, which are described below.

a. Federal Plans, Policies and Regulations

National Energy Conservation Policy Act

The National Energy Conservation Policy Act serves as the underlying authority for federal energy management goals and requirements. Signed into law in 1978, it has been regularly updated and amended by subsequent laws and regulations and is the foundation of most federal energy requirements. This Act established energy-efficiency standards for consumer projects and includes a residential program for low-income weatherization assistance, grants, and loan guarantees for energy conservation in schools and hospitals, and energy-efficiency standards for new construction. Initiatives in these areas continue today.

National Energy Policy Act of 2005

The National Energy Policy Act of 2005 sets equipment energy efficiency standards and seeks to reduce reliance on nonrenewable energy resources. The Act provides incentives to reduce current energy resources demand such as permitting consumers and businesses to attain federal tax credits for purchasing fuel-efficient appliances and products, including hybrid vehicles; constructing energy-efficient buildings; and improving the energy efficiency of commercial buildings. Additionally, tax credits are available for the installation of qualified fuel cells, stationary microturbine power plants, and solar power equipment.

Executive Order 13423 (Strengthening Federal Environmental, Energy, and Transportation Management), signed in 2007, strengthens the key energy management goals for the federal government and sets more challenging goals than the Energy Policy Act of 2005. The energy reduction and environmental performance requirements of Executive Order 13423 were

expanded in Executive Order 13514 (Federal Leadership in Environmental, Energy, and Economic Performance), which was signed in 2009.

Energy Independence and Security Act

In response to the *Massachusetts et al. vs. Environmental Protection Agency et al.* ruling, the Bush Administration issued an executive order on May 14, 2007, directing the Environmental Protection Agency (EPA) and Department of Transportation (US DOT) to establish regulations that reduce greenhouse gas emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. On December 19, 2007, President Bush signed the Energy Independence and Security Act of 2007. Among other key measures, the act includes the following, which should aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by model year 2020 and direct National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

Corporate Average Fuel Economy Standards

The federal Corporate Average Fuel Economy (CAFE) standards for vehicles in model years 2011 to 2016 (first phase of standards) and 2017 to 2025 (second phase) provide strict fuel economy requirements. These standards are projected to result in an average industry fleetwide level of 163 grams/mile of carbon dioxide (CO₂) in model year 2025, which is equivalent to 54.5 miles per gallon (mpg) if achieved exclusively through fuel economy improvements. The program is projected to:

- Cut 6 billion metric tons of GHG over the lifetimes of the vehicles sold in model years 2012-2025.
- Save families more than \$1.7 trillion in fuel costs.
- Reduce America's dependence on oil by more than 2 million barrels per day in 2025.

As part of the 2017-2025 standards rulemaking, USEPA, National Highway Traffic Safety Administration, and California Air Resources Board are to complete an evaluation of standards for vehicle model years 2022-2025.

EPA and NHTSA Joint Rulemaking for Vehicle Standards

In April 2010, the EPA and NHTSA issued a final rulemaking establishing new federal greenhouse gas and fuel economy standards for model years 2012 to 2016 passenger cars, light-duty trucks, and medium-duty passenger vehicles. In addition, on August 9, 2011, the EPA and NHTSA finalized regulations to reduce GHGs and improve fuel efficiency of medium- and heavy-duty vehicles, including large pickup trucks and vans, semi-trucks, and all types and sizes of work trucks and buses.

In August 2016, the EPA and NHTSA adopted the next phase (Phase 2) of the fuel economy and GHG standards for medium- and heavy-duty trucks, which apply to vehicles with model year 2018 and later (U.S. EPA, 2016). In response to the USEPA's adoption of the Phase 2 standards, California Air Resources Board (ARB) staff plan to bring a proposed California Phase 2 program before its Board in 2017 (CARB, 2016).

b. State Plans, Policies, and Regulations

Senate Bill 1389, State of California Integrated Energy Policy

In 2002, the Legislature passed Senate Bill 1389, which required the California Energy Commission to develop an integrated energy plan biannually for electricity, natural gas, and transportation fuels, for the California Energy Report. The plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for Zero Emission Vehicles and their infrastructure needs, and encouragement of urban designs that reduce vehicle miles traveled and accommodate pedestrian and bicycle access.

An overarching goal of the integrated energy plan is to achieve the statewide greenhouse gas reduction targets, while improving overall energy efficiency is the main focus. The integrated energy plan is the State's chief program intended to provide a comprehensive statewide energy strategy to guide energy investments, energy-related regulatory efforts, and greenhouse gas reduction measures.

Renewables Portfolio Standard

California's Renewables Portfolio Standard, established in 2002 and amended in 2006 and 2011 requires retail sellers of electric services, including investor-owned utilities, publicly owned utilities, direct access providers, and community choice providers, to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by December 31, 2020. The Renewables Portfolio Standard also required 20 percent of retail sales to be sourced from renewable energy by 2013, and 25 percent of retail sales to be sourced from renewable energy by 2016.

A renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts (MW) or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location.

California Public Utilities Commission Plans and Programs

The California Public Utilities Commission (CPUC) has authority to set electric rates, regulate natural gas utility service, protect consumers, promote energy efficiency, and ensure electric system reliability. The CPUC has established rules for the planning and construction of new transmission facilities, distribution facilities, and substations. Utility companies are required to obtain permits to construct certain power line facilities or substations. The CPUC also has jurisdiction over the siting of natural gas transmission lines.

The CPUC regulates distributed energy generation policies and programs for both customers and utilities. This includes incentive programs (e.g., California Solar Initiative) and net energy metering policies. Net energy metering allows customers to receive a financial credit for power generated by their on-site system and fed back to the utility. The CPUC is involved with utilities through a variety of energy procurement programs, including the Renewable Portfolio Standard program.

In 2008, the CPUC adopted the Long-Term Energy Efficiency Strategic Plan, which is a road map to achieving maximum energy savings in California through 2020. Consistent with California's energy policy and electricity "loading order," the Energy Efficiency Strategic Plan indicates that energy efficiency is the highest priority resource in meeting California's energy needs. The CPUC also adopted energy goals that require all new residential construction in California to be zero net energy by 2020. The zero net energy goal means new buildings must use a combination of improved efficiency and distributed renewable energy generation to meet 100 percent of their annual energy need. In addition to the zero net energy goals for residential buildings by 2020, the CPUC has adopted goals that all new commercial construction in

California will be zero net energy by 2030 and 50 percent of existing commercial buildings will be retrofitted to zero net energy by 2030.

Senate Bill 350 Clean Energy and Pollution Reduction Act of 2015

Senate Bill 350 (Chapter 547, Statutes of 2015), 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 EO B-30-15. This Act is intended to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. SB 350:

1. Increases requirements for procurement of electricity generated and sold to retail customers from eligible renewable energy resources from 33 percent to 50 percent by December 31, 2030.
2. Requires the State Energy Resources Conservation and Development Commission to establish annual targets for statewide energy efficiency savings and demand reduction that would achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas final end uses of retail customers by January 1, 2030.

Title 24 Building Energy Efficiency Standards

Title 24 of the California Code of Regulations (CCR) is the means by which California regulates energy consumption. The Title 24 Building Energy Efficiency Standards apply to energy consumed for heating, cooling, ventilation, water heating, and lighting in new residential and nonresidential buildings. The Title 24 standards, first adopted by the CEC in 1978, are updated periodically to incorporate new energy efficiency technologies and methods.

The California Green Building Standards Code was adopted as part of Title 24 in 2008 and was last updated in 2016. The code establishes voluntary standards for planning and design for energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, sustainable site development, and internal air contaminants.

California Green Building Standards Code

In 2013, the California Building Standards Commission adopted the 2013 California Green Building Standards Code that also included the latest 2013 CALGreen Code, which became effective on January 1, 2014. The mandatory provisions of the code are anticipated to reduce 3 million metric tons (MMT) of GHG emissions by 2020, reduce water use by 20 percent or more, and divert 50 percent of construction waste from landfills. The 2013 California Energy Code (Title 24, Part 6), which is also part of the CALGreen Code (Title 24, Part 11, Chapter 5.2), became effective on July 1, 2014.

The CALGreen Code contains requirements for construction waste reduction, water conservation, and natural resource conservation. The Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building. The code also requires building commissioning, which is a process for the verification that all building systems, such as heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

The CALGreen Code provides standards for bicycle parking, carpool/vanpool/electric vehicle spaces, light and glare reduction, grading and paving, energy efficient appliances, renewable energy, graywater systems, water efficient plumbing fixtures, recycling and recycled materials, pollutant controls (including moisture control and indoor air quality), acoustical controls, storm water management, building design, insulation, flooring, and framing, among others.

The 2019 CALGreen Code took effect January 1, 2020. CALGreen requires every new building constructed in California to reduce water consumption by 20 percent, divert 65 percent of construction waste from landfills, and install low-pollutant-emitting materials. It also requires separate water meters for non-residential buildings' indoor and outdoor water use, with a requirement for moisture-sensing irrigation systems for larger landscape projects and mandatory inspections of energy systems (e.g., heat furnace, air conditioner, and mechanical equipment) for non-residential buildings larger than 10,000 SF to ensure that all are working at their maximum capacity and according to their design efficiencies.

Senate Bills 1078 and 107 and Executive Order S-14-08 and S-21-09

Senate Bill (SB) 1078 (Chapter 516, Statutes of 2002) requires 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. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010. In November 2008, then-Governor Schwarzenegger signed Executive Order S-14-08, which expands the state's Renewable Portfolio Standard to 33 percent renewable power by 2020. In September 2009, the Governor continued California's commitment to the Renewable Portfolio Standard by signing Executive Order S-21-09, which directs the California Air Resources Board under its Assembly Bill (AB) 32 authority to enact regulations to help the state meet its Renewable Portfolio Standard goal of 33 percent renewable energy by 2020.

Assembly Bill 1007 (Pavley, Chapter 371, Statutes of 2005)

Assembly Bill 1007 required the California Energy Commission (CEC) to prepare a state plan (State Alternative Fuels Plan) to increase the use of alternative fuels in California. The Commission prepared the State Alternative Fuels Plan in partnership with the California Air Resources Board and in consultation with other state, federal, and local agencies. The final State Alternative Fuels Plan, published in December 2007, attempts to achieve an 80-percent

reduction in greenhouse gas emissions associated with personal transportation, even as California's population increases. Measures proposed that would reduce petroleum fuel use include:

1. Lowering the energy needed for personal transportation by tripling the energy efficiency of on-road vehicles by 2050 through:
 - a. Conventional gas, diesel, and flexible fuel vehicles (FFVs) averaging more than 40 miles per gallon (mpg).
 - b. Hybrid gas, diesel, and FFVs averaging almost 60 mpg.
 - c. All electric and plug-in hybrid electric vehicles (PHEVs) averaging well over 100 mpg (on a greenhouse gas equivalents [GGE] basis) on the electricity cycle.
 - d. Fuel cell vehicles (FCVs) averaging over 80 mpg (on a GGE basis).
2. Moderating growth in per capita driving, reducing today's average per capita driving miles by about 5 percent or back to 1990 levels.
3. Changing the energy sources for transportation fuels from the current 96 percent petroleum-based to approximately:
 - a. 30 percent from gasoline and diesel from traditional petroleum sources or lower GHG emission fossil fuels such as natural gas.
 - b. 30 percent from transportation biofuels.
 - c. 40 percent from a mix of electricity and hydrogen.
4. Producing transportation biofuels, electricity, and hydrogen from renewable or very low carbon-emitting technologies that result in, on average, at least 80 percent lower life cycle GHG emissions than conventional fuels.
5. Encouraging more efficient land uses and greater use of mass transit, public transportation, and other means of moving goods and people.

Senate Bill 1368, Performance Standard for Baseload Power Generation

SB 1368 (Chapter 598, Statutes of 2006) required the CPUC to establish a GHG emissions performance standard for "baseload" generation from investor-owned utilities of 1,100 lbs. CO₂/MWh. The CEC established a similar standard for local publicly owned utilities. All electricity provided to California, including imported electricity, must be generated from plants that meet or exceed this standard.

SB 1, California Solar Initiative

Also known as "Million Solar roofs" legislation, SB1 set a goal of installing 3,000 megawatts of new solar energy generation by 2017. New buildings within the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas will be required to be designed to allow for roof-mounted solar installation.

c. Local Plans, Policies, and Regulations**City of Inglewood Energy and Climate Action Plan**

The City of Inglewood developed an Energy and Climate Action Plan (ECAP) in 2013 that evaluates both energy and greenhouse gas emissions. In addition, the Inglewood ECAP is a roadmap for achieving community-wide energy and greenhouse gas emissions reductions that encourages the City to grow more sustainably. The ECAP includes the following: an energy and greenhouse gas emissions inventory, reduction target/goal, reduction strategies, and an implementation program. The ECAP sets forth six general strategies: (1) lead by example, (2) increase energy efficiency, (3) support renewable energy generation, (4) improve transportation options and manage transportation demand, (5) reduce consumption and waste, and (6) adapt to the potential for climate change. Relevant measures from the ECAP include:

- Lead by Example
 - Replace City-owned street, park, traffic lights with LED lights
 - Electric Vehicle Infrastructure
 - Water efficient irrigation systems and recycled water use in municipal parks and landscaping
 - Increase open space and tree planting
- Increase Energy Efficiency
 - Explore development of commercial and residential energy conservation ordinances
 - Identify energy efficiency upgrades for historic buildings
 - Explore development of a multi-family retrofit program
 - Replace non-city owned street and parking lot lighting with LED lights
- Support Renewable Energy Generation
 - Pursue loans, grants, rebates, and incentives for installation of renewable energy generation facilities
- Improve Transportation Options and Manage Transportation
 - Installation of Intelligent Transportation System elements
 - Pedestrian safety and access improvements
 - Crenshaw Corridor light rail service
 - Local shuttle service
 - Prioritize transportation funding for pedestrians and bicycles around transit

- Expand bicycle lanes
- Increase bicycle parking
- Encourage provision of “end of trip” facilities (bike lockers, showers, changing spaces) at places of employment
- Explore limiting parking for new development within one-half mile of transit stations

Inglewood Energy Efficiency Climate Action Plan

The City developed an Energy Efficiency Climate Action Plan³⁷ (EECAP) in December 2015 that evaluates both energy and GHG emissions. In addition, the Inglewood EECAP is a roadmap for achieving community-wide energy and GHG emissions reductions that encourages the City to grow more sustainably. The EECAP includes the following: an energy and GHG emissions inventory, reduction target/goal, reduction and efficiency strategies, and an implementation program. The EECAP sets forth six general goals for community GHG reduction: (1) increase energy efficiency in existing residential units, (2) increase energy efficiency in new residential development, (3) increase energy efficiency in existing commercial units, (4) increase energy efficiency in new commercial development, (5) increase energy efficiency through water efficiency, and (6) decrease energy demand through reducing urban heat island effect. Additionally, the EECAP sets forth four general goals for municipal GHG reduction: (1) participate in education, outreach, and planning for energy efficiency, (2) increase energy efficiency in municipal buildings, (3) increase the energy efficiency in city infrastructure, (4) reduce energy consumption in the long term.

Utilities-Based Energy Conservation Programs

The Southern California Edison Company (SCE) and SoCalGas provide several programs for energy customers in Inglewood to conserve energy. Programs include Consumer Rebate Programs, a Refrigerator Turn-In and Recycling Program, Green Power Program, Outdoor Area Lighting Program, Solar Power Incentives, Power Quality Consulting Programs, and Electric Vehicle Programs. Programs include:

- Commercial Lighting Efficiency Offer;
- Heating, Ventilation and Air Conditioning (HVAC) Rebate Program;
- Customer Generation Rebate, Technical Assistance Program;
- Premium Efficiency Motors (PEM) Program;
- Chiller Efficiency Program;
- Energy Load Monitoring (ELM) Program; and

- Financing Programs.

Programs for non-residential customers include rebates on energy efficient HVAC systems and refrigeration equipment, customer generation rebates, energy-load monitoring, energy-efficiency financing, and solar power initiatives.

3.9.3 ENVIRONMENTAL SETTING

a. Electricity

The Southern California Edison Company is the electrical purveyor for the City of Inglewood, and services approximately 59,468 customers/meters in the City (SCE, 2016). In Inglewood's residential neighborhoods, existing electrical facilities largely consist of an overhead electrical system, including poles carrying low voltage conduits along with telecommunication and cable TV facilities. In most of the City's commercial and industrial areas, the existing electrical networks are underground within all the streets (JMC² 2017).

Southern California Edison is currently in the process of rehabilitating the 39 circuits that serve the City to ensure system reliability. The rehabilitation process includes equipment replacement, safety upgrades, and installation of alternate sources of power (SCE, 2016).

b. Natural Gas

The Southern California Gas Company is the natural gas purveyor within the City of Inglewood. Both TOD Plan areas have an extensive natural gas facility network with good comprehensive coverage. The existing gas lines within the TOD Plan areas range in size from one-inch to 10-inches (JMC² 2017).

In 2014, the Southern California Gas Company developed an implementation plan for the orderly and cost-effective testing and where needed replacement of natural gas transmission pipelines in the system that had not previously been pressure-tested. Since implementation of this plan upgrade, the Southern California Gas Company has replaced or retrofitted equipment and installed mainline valves with the energy-saving technology that allows them to be opened or closed remotely by system operators at a central control location, or that automatically shuts off the flow of natural gas in the event of a large pressure drop (SCG, 2016).

Recent natural gas infrastructure improvements near the TOD Plan areas include pipeline replacement within Crenshaw Boulevard near Manchester Boulevard and Florence Avenue and hydrostatic pressure testing of existing pipelines (SCG, 2016).

The Southern California Gas Company expects its active meters to grow an average of 0.8 percent annually from 2013 through 2035. However, the Gas Company projects total gas demand to decline at an annual rate of 0.33 percent from 2013 to 2035 (CGEU, 2014). The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency standards and programs, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to “Advanced Metering Infrastructure” (CGEU, 2014).

The Southern California Gas Company has developed projections for capacity and demand for gas supplies through 2035, which shows a capacity of 3,875 billion cubic feet and a demand of 2,647 billion cubic feet in an average temperature year (CGEU, 2014).

3.9.4 SIGNIFICANCE CRITERIA

Appendix F of the CEQA Guidelines provides guidance for assessing energy impacts of projects. The appendix provides three goals:

- Decreasing overall per capita energy consumption;
- Decreasing reliance on natural gas and oil; and
- Increasing reliance on renewable energy sources.

Consistent with Appendix F goals, the significance criteria used to evaluate environmental impacts in this analysis focus on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Thus, the proposed TOD Plans would have a significant effect on the environment if they were to:

Threshold EN-1 Use large amounts of energy or fuel, or consume energy or fuel in a wasteful manner:

- During construction, either:
 - As the result of construction activities; or
 - By resulting in the construction or expansion of energy infrastructure that would cause significant environmental effects;
- Following construction, during project operations, either:
 - Within buildings or other on-site operations (stationary source consumption);
 - By resulting in the construction or expansion of energy infrastructure that would cause significant environmental effects; or

- As the result of vehicle trips associated with project site development (mobile source consumption).

Threshold EN-2 Conflict with or obstruct implementation of a State or local plan for non-renewable energy or energy efficiency.

3.9.5 IMPACTS AND MITIGATION MEASURES

Threshold EN-1: Use large amounts of energy or fuel in a wasteful manner.

Impact EN-1.1: Site-specific development projects permitted by the proposed TOD Plans would require energy during construction of proposed residential and non-residential uses. However, site-specific development projects will comply with all federal, state, and/or local energy standards, including requirements for upgrading and maintaining construction equipment. Conditions of approval would be placed on site construction to require use of electricity from the adjacent electrical grid rather than onsite diesel generators, address equipment left running when not in use, design of off-road travel routes, and design and use of lighting during construction. As a result, energy usage during construction would not be considered wasteful, inefficient, or unnecessary. The resulting impact would be *less than significant*.

Methodology

CEQA Guidelines Appendix F defines conserving energy as: decreasing overall per capita energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. Neither Appendix F nor Public Resources Code Section 21100(b)(3) offer a numerical threshold of significance that might be used to evaluate the potential significance of energy consumption of a project. Rather, the emphasis is on reducing “the wasteful, inefficient, and unnecessary consumption of energy.”

Construction activities would result in wasteful, inefficient, or unnecessary use of energy if construction equipment is old or not well maintained, if equipment is left to idle when not in use, if travel routes are not planned to minimize vehicle miles traveled, or if excess lighting or water is used during construction activities.

Impact Assessment

Buildout of the proposed TOD Plans would entail demolition of 120 residential units and approximately 1,128,519 square feet of retail, office, institutional and industrial square footage,

along with construction new buildings that would result in a net increase of up to 4,090 residential units; 59,459 square feet of retail space and 1,274,181 square feet of commercial/office space over a 20-year period. During that same period, there would be a net loss within the TOD Plan areas of 5,395 square feet of hotel square footage; 118,831 square feet of institutional uses, and 253,639 square feet of industrial space.

During construction of each site-specific development project within the TOD Plan areas, energy would be consumed in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on construction sites, construction worker travel to and from the construction sites, as well as delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction activities within the TOD Plan areas would not result in demand for fuel greater on a per-unit-of-development basis than other development projects in Southern California, with the exception that because the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas are fully developed urban areas, demolition of existing development would need to be undertaken. While such demolition is typical for infill urban development, demolition activities would result in energy consumption that would not need to be consumed on sites where demolition is not required. Because demolition is, in fact, required and not optional to provide for the type of high intensity mixed use, transit oriented development that is at the core of long-term energy conservation and greenhouse gas reduction programs, the energy consumed during site demolition to make way for transit-oriented development is not considered to be wasteful. In addition, because the TOD Plan areas have previously been urbanized, an electrical grid is available for temporary use on construction sites. Although the extent of construction activities that would occur within the Westchester/Veterans and Crenshaw/Imperial areas as the result of the proposed TOD Plans is large, construction and development would occur over a 20-year period, and demand for construction-related electricity and fuels would be spread out over that time frame.

Installation of electrical and gas facilities to serve new uses would correspond with proposed roadway improvements and site-specific building construction. Any new electrical or natural gas line upgrades serving individual buildings within the TOD Plan areas would be constructed in a combined joint trench. The final design and composite plan would be coordinated with SCE and/or the Southern California Gas Company during the design process.

Currently, construction contractors are required to demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting,

repowering, or replacement of heavy-duty diesel on- and off-road equipment. In addition, compliance with existing CARB idling restrictions and the use of newer engines and equipment would reduce fuel combustion and energy consumption.

Furthermore, conditions of approval will be placed on all site-specific development within the TOD Plan areas to implement existing regulations and prevent the wasteful or inefficient use of energy during construction:

- Implement work schedules and procedures that minimize equipment idle time and double handling of material;
- Minimize equipment idling time either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxic Control Measure Title 13, Section 2485 of California Code of Regulations [CCR]);
- Switch off office equipment and lights when not in use;
- Use electrical power from temporary power lines rather than onsite diesel generators;
- Use solar power sources for road signs and other applicable equipment that will be required at the construction site;
- Design all temporary roads to minimize travel distances; and
- Maintain and properly tune all construction equipment in accordance with manufacturer's specifications. It shall be the contractor's responsibility to ensure that all equipment has been checked by a certified mechanic and determined to be running in proper condition prior to operation.

Overall, construction activities would require limited energy consumption, would comply with all existing regulations, and would therefore not use large amounts of energy or fuel in a wasteful manner.

Significance Conclusion for Impact EN-1.1

The proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would require energy during construction of proposed land uses. However, site-specific development projects will comply with all federal, state, and/or local energy standards, including requirements for upgrading and maintaining construction equipment. Conditions of approval would be placed on site construction to require use of electricity from the adjacent electrical grid rather than onsite diesel generators, address equipment left running when not in use, design of off-road travel routes, and design and use of lighting during construction. As a result, energy usage during construction would not be considered wasteful, inefficient, or unnecessary. As a result, the TOD Plans' energy usage during construction would not be considered wasteful, inefficient, or unnecessary. The resulting impact would be less than significant.

Threshold EN-1: Use large amounts of energy or fuel in a wasteful manner.

Impact EN-1.2: The net increase in residential, retail, commercial office, and industrial development that would be permitted by the proposed TOD Plans would increase consumption of energy during operations of new site-specific development. However, new site-specific development would comply with all federal, state, and/or local energy standards. Thus, buildings would comply with CALGreen standards that would require greater energy efficiency than the buildings they replace. As shown in Table 3.6-2, the transit orientation and mixed-use character of development proposed in the TOD Plan areas will result in substantially lower average daily VMT per service population than current development. Thus, vehicular fuel consumption will be substantially lower on a per service population basis than current development within the TOD Plan areas. The TOD Plans' energy usage would not therefore be considered "wasteful," and the impact would be *less than significant*.

Methodology

CEQA Guidelines Appendix F defines conserving energy as: decreasing overall per capita energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. Neither Appendix F nor Public Resources Code Section 21100(b)(3) offer a numerical threshold of significance that might be used to evaluate the potential significance of energy consumption of a project. Rather, the emphasis is on reducing "the wasteful, inefficient, and unnecessary consumption of energy."

Energy usage during operations would be considered wasteful, inefficient, or unnecessary if the project were to increase overall per capita energy consumption, increase reliance on natural gas and oil, or decrease reliance on renewable energy sources. To determine whether a significant impact would result, the TOD Plans were analyzed for compliance with federal, state, and local energy standards; CALGreen standards; and Title 24 of the California Code of Regulations. The TOD Plans were also analyzed to determine whether they would result in increased or decreased per service population VMT; inhibit use of on-site renewable energy systems, pedestrian, or bicycle mobility; or inhibit access to transit.

Information from the CalEEMod™ v2016.3.1 outputs for the TOD Plans' Traffic Impact Analysis (Iteris 2018) was used in this analysis to evaluate operational energy demands.

Impact Assessment

Following construction, site-specific developments permitted by the TOD Plans would include residential, retail, office, hotel, and light industrial uses that generate typically expected demand for electricity, natural gas, and gasoline for motor vehicle trips. Operational use of energy includes the heating, cooling, and lighting of buildings; water heating; operation of electrical systems and plug-in appliances within buildings; parking lot and outdoor lighting; and the transport of electricity, natural gas, and water to the areas where they would be consumed. New development that would be permitted by the proposed TOD Plans would be required to meet CALGreen and Title 24 energy efficiency standards. In complying with these standards, new buildings constructed within the TOD Plan areas would be more energy efficient than the buildings they replace and impacts to peak energy usage periods would be minimized and impacts on statewide and regional energy needs would be reduced.

Additionally, site-specific development projects permitted by the TOD Plans would be within an urbanized area where existing infrastructure provides for efficient delivery of electricity and natural gas to the TOD Plan areas. The TOD Plans provide for a high degree of access to transit, and would improve existing pedestrian and bicycle routes, which is intended to reduce vehicle miles travelled from development within the TOD Plan areas. As shown in **Table 3.6-2**, the transit orientation and mixed-use character of development proposed in the TOD Plan areas will result in substantially lower average daily VMT per service population than current development, which would, in-turn, substantially reduce vehicular-related energy use on a per service population basis. Thus, the proposed TOD Plan would not use large amounts of energy or fuel in a wasteful manner related to vehicle trips.

The TOD Plan also sets forth several sustainability features including:

- Manchester Green Boulevard (would be re-designed with bioswale dividers that separate protected bike lanes from traffic lanes and thereby increase pedestrian and bicycle safety and encourage non-vehicular travel.
- Alley walkways and mid-block pass-throughs would be designed to provide for increased use of pedestrian and bicycle travel.
- Drought-tolerant landscaping would be used on all streetscapes to reduce water consumption and energy required to transport water to the TOD planning areas.
- New structures would be designed so as to accommodate green roofs or solar installations.

Several other aspects of future development in the TOD Plan areas would also help manage the amount and efficiency of energy consumption and would ensure that the related consumption is not inefficient, wasteful, or unnecessary or place a significant demand on regional energy

supplies. The City's administration of the CALGREEN/Title 24 requirements and the City's Energy and Climate Action Plan includes review of design components and energy conservation measures that occurs during the permitting process for each site-specific development project, which ensures that all requirements are met. Typical CALGREEN measures include insulation; use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC); solar-reflective roofing materials; energy-efficient indoor and outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; incorporation of skylights, etc. Thus, each future site-specific development project that would be permitted by the TOD Plans would not use large amounts of energy or fuel in a wasteful manner within buildings or other onsite operations.

In addition, other existing regulations are likely to result in more efficient use of all types of energy, and reduction in reliance on non-renewable sources of energy within the TOD planning areas over the next 20+ years. These include the federal Energy Independence and Security Act, the state Long Term Energy Efficiency Strategic Plan, and the state CALGREEN/Title 24 regulations (all described above), which are designed to reduce reliance on non-renewable energy resources and reduces demand by providing federal tax credits for purchasing fuel-efficient items, and providing goals for developing energy efficient buildings, and improving the renewable fuel, appliance, and lighting standards.

Significance Conclusion for Impact EN-1.2

The net increase in residential, retail, and commercial office development that would be permitted by the proposed TOD Plans would increase consumption of energy during operations of new site-specific development. However, new site-specific development would comply with all federal, state, and/or local energy standards. Thus, buildings would comply with CALGreen standards that would require greater energy efficiency than the buildings they replace. As shown in **Table 3.7-2**, the transit orientation and mixed-use character of development proposed in the TOD Plan areas will result in substantially lower average daily VMT per service population than current development. Thus, vehicular fuel consumption will be substantially lower on a per service population basis than current development within the TOD Plan areas. The TOD Plans' energy usage would not therefore be considered "wasteful," and the impact would be less than significant.

Threshold EN-2	Conflict with or obstruct implementation of a State or local plan for non-renewable energy or energy efficiency.
Impact EN-2	Development permitted by the Westchester/Veterans and Crenshaw/Imperial TOD Plans will be required to comply with applicable regulatory requirements set forth in the most recent CALGreen Code and Title 24 requirements as adopted by the City of Inglewood at the time of issuance of building permits. In addition, as demonstrated in Table 3.9-1, development within the TOD Plans will implement all relevant provisions of the Ingles Energy and Climate Action Plan. As a result, the TOD Plans will not conflict with or obstruct implementation of a State or local plan for non-renewable energy or energy efficiency. Impacts would therefore be <i>less than significant</i>.

Impact Assessment

CALGreen Building Code and Title 24

Demolition and new construction permitted by the TOD Plans would be required to comply with applicable regulatory requirements set forth in the most recent CALGreen Code and Title 24 requirements as adopted by the City of Inglewood at the time of issuance of building permits.

Inglewood Energy and Climate Action Plan

The Inglewood Energy and Climate Action Plan (ECAP) includes a wide variety of strategies and actions to reduce energy consumption and greenhouse gas emissions. Many of these measures can only be implemented on a citywide basis. **Table 3.9-1** analyzes the consistency of the TOD Plans with those ECAP measures that can be implemented on a project-by-project basis.

Table 3.9-1: Analysis of Consistency with the Inglewood Energy and Climate Action Plan

Relevant Inglewood Energy and Climate Action Plan Strategies and Actions	Project Consistency
Strategy 1: Lead by Example	
Replace all City-owned street, park, and traffic lights with LED lights.	All new City-owned street, park, and traffic lights within the TOD Plan areas will be LED.
Pursue electric vehicle infrastructure, such as charging stations, as well as adding new vehicles to the fleet.	The TOD Plans provide for electric vehicle infrastructure, such as charging stations, in strategic locations.
Replace all conventional irrigation and sprinkler systems with water-efficient irrigation systems by 2025 and transition to native and drought-tolerate vegetation.	All new irrigation and sprinkler systems within the TOD Plan areas will be water-efficient irrigation systems. New

Relevant Inglewood Energy and Climate Action Plan Strategies and Actions	Project Consistency
	landscaping will emphasize native and drought-tolerate vegetation.
Increase the amount of open space and number of shade tree plantings in Inglewood.	The TOD Plans would expand the amount of open space within the Plan areas and provide for substantial new tree plantings.
Strategy 2: Increase Energy Efficiency	
Work with businesses and Southern California Edison to replace all non-City owned street and parking lot lights with LED lights.	All new non-City-owned street and parking lot lights within the TOD Plan areas will be LED.
California's Title 24 Building Energy Code is updated every three years, continually increasing energy standards.	New buildings within the Tod Plan areas will be required to comply with the most recent Title 24 Building Energy Code requirements adopted by the City at the time off building permit issuance.
Strategy 3: Support Renewable Energy Generation	
Streamline residential renewable installation by training staff and providing permits "over the counter."	New residential, retail, and employment-generating buildings within the TOD Plan areas will include solar energy installations. In addition, the TOD Plans provide for installation of photovoltaic panels on the top floor of parking structures for energy production and vehicular shade.
Strategy 4: Improve Transportation Options and Manage Transportation Demand	
Work with Metro to develop station areas in Inglewood for the Crenshaw Corridor Light Rail Service.	The Westchester/Veterans TOD Plan explicitly implements this action, proving a plan for intensifying development adjacent to the Westchester/Veterans Metro Station.
Implement the General Plan proposed bicycle routes or equivalent.	The TOD Plans each provide a comprehensive plan for improvement of bicycle facilities consistent and expanding on the City's General Plan.
Require new commercial developments and multi-family housing to provide secure bicycle parking.	The TOD Plans require new commercial developments and multi-family housing to provide secure bicycle parking.
Encourage employers to provide end-of-trip facilities, including bike lockers, showers, and changing spaces.	The TOD Plans include provisions encouraging employers to provide end-of-trip facilities, including bike lockers, showers, and changing spaces.
Introduce market rate pricing for on-street parking within one-quarter of a mile from Crenshaw Transit Corridor Stations.	On-street parking within one-quarter mile of the Westchester/Veterans Metro Station will be provided with market rate pricing.
Establish parking maximums for new development within one-half mile of future rail or rapid bus stations.	The TOD Plans both provide parking maximums for new development within one-half mile of Metro light rail stations.
Allow parking cash out for City Hall and businesses within ½ of a mile from Crenshaw Transit Corridor Stations ¹ .	Because the TOD Plan areas are within the South Coast Air Basin, which is designated as a nonattainment area, requirements for provision of a parking cash-out program apply to both TOD Plan areas.
Target intensification and diversification of future development in areas around Crenshaw Rail transit stations.	The Crenshaw/Imperial TOD Plan explicitly implements this action, proving a plan for intensifying development adjacent to the Westchester/Veterans Metro Station.

¹ California Health and Safety Code §43845 requires each employer of 50 persons or more who provides a parking subsidy to employees to offer a parking cash-out program consisting of an employer-funded program under which an employer offers to provide a cash allowance to an employee equivalent to the parking subsidy that the employer would otherwise pay to provide the employee with a parking space.

Relevant Inglewood Energy and Climate Action Plan Strategies and Actions	Project Consistency
Encourage construction of affordable and market rate housing, particularly in areas around transit stations.	The TOD Plans provide for a net increase of 4,090 affordable and market rate dwelling units within walking distance (1/2 mile) of Metro light rail stations.
Strategy 5: Reduce Consumption and Waste	
Accelerate the installation of low-flow water fixtures in residential homes and expand the program to commercial businesses.	All water fixtures in residential, retail, and employment generating buildings within the TOD Plan areas will be low flow.
Reduce landscaping water use by encouraging water-efficient irrigation systems, grass replacement, and planting native and drought-resistant trees and vegetation.	All new landscaping within the TOD Plan areas will include water-efficient irrigation systems, minimal use of grass, and emphasize use of native and drought-resistant trees and vegetation.
Strategy 6: Adapt to the Potential Impacts of Climate Change	
Explore a cool roofs policy for new residential development with air conditioning that applies the voluntary standards established by CALGreen.	The TOD Plans provide for “green roofs” that can be used as planting areas, domestic gardens, small-scale food production, general recreation. In addition, stormwater drainage from roofs and the surrounding sites can be captured and harvested for re-use in landscaped areas through low-flow drainage systems. Photovoltaic panels can also be installed on green roofs to generate renewable energy while providing shade for rooftop recreation. The TOD Plans provide for “green roofs” that can be used as planting areas, domestic gardens, small-scale food production, along with other uses identified above.
Promote the increase in vegetative cover and green roofs to cool the environment through shading and evapotranspiration.	
Explore requiring the planting of shade trees on the south and west facings sides of new residential and commercial development.	New development within the TOD Plan areas will be provided with extensive landscaping, including shade trees on the south and west facings sides of new residential, retail, and employment-generating development.

Significance Conclusion for Impact EN-2

Development permitted by the Westchester/Veterans and Crenshaw/Imperial TOD Plans will be required to comply with applicable regulatory requirements set forth in the most recent CALGreen Code and Title 24 requirements as adopted by the City of Inglewood at the time of issuance of building permits. In addition, as demonstrated in Table 3.9-1, development within the TOD Plans will implement all relevant provisions of the Ingles Energy and Climate Action Plan. As a result, the TOD Plans will not conflict with or obstruct implementation of a State or local plan for non-renewable energy or energy efficiency. Impacts would therefore be less than significant, and no mitigation would be required.

3.9.6 REFERENCES - ENERGY RESOURCES

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3.10 NOISE

3.10.1 INTRODUCTION

a. Overview

This section evaluates the noise impacts that would result from site-specific development and infrastructure projects permitted by the proposed Westchester Veterans and Crenshaw/Imperial TOD Plans. It discusses the existing noise environment within and around the TOD Plan areas, as well as the noise-related regulatory framework for future development. It also analyzes the effect that site-specific development and infrastructure projects permitted by the TOD Plans would have on the areas' ambient noise environment during demolition, construction, and operational activities, and evaluates the TOD Plans' noise effects for consistency with relevant City of Inglewood noise standards. The analysis in this section also addresses impacts in relation to groundborne vibration. The analyses in this section are based on a technical noise and vibration analyses prepared by Entech Consulting Group. Modeling results are provided in Appendix E.

b. Fundamentals of Noise

"Sound" is defined as mechanical energy transmitted by pressure waves through a medium such as air. "Noise" is defined as unwanted sound. Sound is characterized by various parameters, including the rate of oscillation of sound waves (frequency), the speed of propagation, and the pressure level or energy content (amplitude).

Sound always has a source. Sound sources include construction activities, automobile and rail traffic, jets flying overhead, people talking, or on-site operations. The loudness of a sound source depends on how rapidly the object converts energy into sound energy. In contrast, an individual's perception of the loudness of a sound depends on their distance from the sound's source.

In addition, sound is characterized by both its amplitude and frequency (or pitch). 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 (sound power). When all the audible frequencies of a sound are measured, a sound spectrum is plotted consisting of a range of frequency 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.

The human ear does not hear all frequencies equally. In particular, human hearing de-emphasizes low and very-high frequencies. To approximate the sensitivity of human hearing,

the A-weighted decibel scale (dBA) is used. Therefore, when assessing potential noise impacts on the surrounding community, sound is measured using an electronic filter that de-emphasizes frequencies that are largely undetectable by the human ear. This method of frequency weighting is referred to as “A-weighting.” It is expressed in units of A-weighted decibels (dBA)¹ and follows an international standard methodology of frequency de-emphasis and is typically applied to community noise measurements. On this scale, the human range of hearing extends from approximately 3 dBA to around 140 dBA.

Noise Exposure and Community Noise

An individual’s *noise exposure* is a measure of the noise experienced by the individual over a period of time. A *noise level* is a measure of noise at a given instant in time. However, noise levels rarely persist consistently over a long period of time. Rather, noise in a community varies continuously over time with respect to the contributing sound sources. Noise levels in any given community are typically the product of many distinct noise sources at various locations, which combine to create a relatively stable background noise exposure, with the individual contributors being largely unidentifiable. The level of background noise at any given location typically changes throughout the day, but does so gradually, corresponding with the addition and subtraction of distant noise sources such as traffic and atmospheric conditions.

Additionally, short-duration single-event noise sources (e.g., aircraft flyovers, motor vehicles, trains, sirens), many of which are readily identifiable to individuals, also contribute to the variability of community noise, beyond the fluctuations attributable to varying background noise levels.

These successive additions of sound to a community’s noise environment vary the community noise level from instant to instant, requiring that noise exposure be measured over a period of time to characterize a community noise environment and evaluate noise impacts. Because an area’s noise environment is continually changing, describing a community’s noise environment requires the measurement of noise over a period of time to accurately characterize the noise environment. This time-varying characteristic of community noise is described using various noise descriptors, including:

L_{eq} The equivalent sound level, which is used to describe noise over a specified period of time, typically 1 hour, in terms of a single numerical value. The L_{eq} of a time-varying signal and that of a steady signal are the same if they deliver the same acoustic energy over a given time. The L_{eq} may also be referred to as the average sound level.

L_{max} The instantaneous maximum noise level experienced during a given period of time.

¹ All noise levels reported herein reflect A-weighted decibels unless otherwise stated.

- L_{\min} The instantaneous minimum noise level experienced during a given period of time.
- L_x The sound level that is equaled or exceeded “x” percent of a specified time period. The “x” thus represents the percentage of time a noise level is exceeded. For instance, L50 and L90 represent the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.
- Ldn Also termed the “day-night” average noise level (DNL); a measure of the average of A-weighted sound levels occurring during a 24-hour period, accounting for the greater sensitivity of most people to nighttime noise by weighting noise levels at night (penalizing” nighttime noises). Noise between 10:00 p.m. and 7:00 a.m. is weighted by adding 10 dBA account for the greater annoyance of nighttime noises.
- CNEL The Community Noise Equivalent Level, which, similar to the Ldn, is the average A-weighted noise level during a 24-hour day that is obtained after an addition of 5 dBA to measured noise levels between the hours of 7:00 p.m. to 10:00 p.m. and after an addition of 10 dBA to noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

The “ambient noise level” is the background noise level associated with a given environment at a specified time and is usually a composite of sound from many sources from many directions, near and far, with no particular dominant sound.

Sensitive Uses

Noise-sensitive land uses are generally defined to include places where people sleep, such as residences, hospitals, and hotels; institutional land uses where it is important to avoid interference with speech or reading, such as schools, libraries, and churches; and outdoor areas where quiet is fundamental to its specific use (i.e., amphitheaters). Noise may be perceived at a sensitive use as “intrusive” when noise levels exceed ambient noise levels. The relative intrusiveness of a sound depends on its amplitude, duration, frequency, and time of occurrence and tonal or informational content, as well as the prevailing ambient noise level.

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., startle response)
- 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 refer to interruption of daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and sleep. Sleep interference effects can include both awakening and arousal to a lesser state of sleep. With regard to the subjective effects, the responses of individuals to similar noise events are diverse and are 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. **Table 3.10-1** lists typical human perceptions of common types of noise.

Overall, a wide variation of tolerance to noise exists, 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 the noise compares to the existing 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:

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived.
- Outside of the laboratory, a 3-dBA change in noise levels is considered to be a barely perceivable difference.
- A change in noise levels of 5 dBA is considered to be a readily perceivable difference.
- A change in noise levels of 10 dBA is subjectively heard as doubling of the perceived loudness.

These relationships occur in part because of the logarithmic nature of sound and the decibel system. Because the human ear perceives sound in a non-linear fashion, the decibel scale was developed. Because the decibel scale is based on logarithms, an increase of 10 decibels is equivalent to a 10-times increase in sound energy and is perceived by humans as approximately a doubling of loudness. Thus, using the decibel scale, sound levels from two or more sources cannot be directly added together to determine the overall sound level. Rather, the combination of two sounds at the same level yields an increase of 3 dBA. For example, if two identical noise sources produce noise levels of 60 dBA, the combined sound level would be 63 dBA, not 120 dBA.

TABLE 3.10-1: COMMON SOUND LEVELS AND THEIR NOISE SOURCE CHARACTERISTICS

Commercial/ Industrial	Noise Source		A-Weighted Sound Level (dB)	Relative Sound Intensity	Noise Environment	Relative Human Perception
	Construction	Residential				
Fireworks			140	100,000,000	Deafening	128 times as loud
Jet takeoff, 100 feet	Jack hammer	Civil defense siren	130	10,000,000	Threshold of Pain	64 times as loud
Police siren	Sandblasting		120	1,00,000	Extremely Loud	32 times as loud
Heavy truck	Pile driver	Baby crying	110	100,000	Very Loud	16 times as loud
Jet flyover at 1,000 feet	Bulldozer	Blender	100	10,000	Very Loud	8 times as loud
Railroad	Exterior finishing, 50 feet	Power mower	90	1,000	Very Loud	4 times as loud
Airplane at 1 mile	Front loader, 50 feet	Garbage disposal	80	100	Loud	2 times as loud
Noisy restaurant		Vacuum cleaner, 10 feet	70	10	Moderately Loud	Reference Level
Busy office		Piano practice	65	—		
Average office		Electric shaver	60	1	Quiet	½ as loud
Suburban street		Birds, 10 feet	55	—	Quiet	—
Quiet office		Home office	50	1 x 10 ⁻²	Quiet	¼ as loud
		Refrigerator hum	40	1 x 10 ⁻³	Faint	⅛ as loud
Library		Whisper	30	1 x 10 ⁻⁴	Faint	—
		Bedroom at night	20	1 x 10 ⁻⁵	Very Faint	—
		Rustling leaves	10	1 x 10 ⁻⁶	Very Faint	—
		Threshold of hearing	1-3	—	Quiet to Barely Audible	—

Source: Metis, 2018.

Noise Attenuation

Stationary point sources of noise, including mobile sources such as idling vehicles, attenuate (lessen) at a rate of approximately 6 dBA per doubling of distance from the source over hard surfaces to 7.5 dBA per doubling of distance from the source over soft surfaces, depending on the topography of the area and environmental conditions (e.g., atmospheric conditions, noise barriers [either vegetative or manufactured]). Thus, a 90 dBA noise measured at 50 feet from the source would attenuate to about 84 dBA at 100 feet, 78 dBA at 200 feet, 72 dBA at 400 feet, and so forth. Widely distributed noise, such as a large industrial facility spread over many acres or a

street with moving vehicles, would typically attenuate at a lower rate, approximately 4 to 6 dBA per doubling of distance from the source.

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 changes in noise levels with distance (drop-off rate) are 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. In addition to geometric spreading, an excess ground attenuation value of 1.5 dBA (per doubling distance) is normally assumed for soft sites. Line sources (such as 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.

c. Fundamentals of Vibration

Vibration is energy transmitted in waves through the ground or man-made structures. These energy waves generally dissipate with distance from the vibration source. As described in the Federal Transit Administration (FTA) 2006 *Transit Noise and Vibration Impact Assessment*, groundborne vibration can be a serious concern for nearby neighbors of a transit system route or maintenance facility, causing buildings to shake and generating audible rumbling sounds. In contrast to airborne noise, groundborne vibration is not a common environmental problem. It is unusual for vibrations from sources such as buses and trucks on a normal roadway to be perceptible by individuals, even in locations close to major roads. However, there are some common sources of groundborne vibration, including trains, buses on rough roads, and construction activities such as blasting, pile driving, and operating heavy earth-moving equipment.

There are several different methods used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts on buildings. Although peak particle velocity is appropriate for evaluating the potential of building damage, it is not suitable for evaluating human response since it takes time for humans to perceive and react to vibration. Alternatively, the root mean square (RMS) amplitude, which is defined as the average of the squared amplitude of the signal, is most frequently used to describe the effect of vibration on the human body. RMS is commonly measured with the Decibel notation (Vdb). 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 structures (especially older masonry structures), people (especially residents, the elderly and sick), and vibration-sensitive equipment.

The effects of groundborne vibration include movement of the building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. In extreme cases, the vibration can cause damage to buildings. Building damage is not a factor for most development and infrastructure projects, with the occasional exception of blasting and pile driving during construction. Annoyance from vibration often occurs when the vibration exceeds the threshold of perception by only a small margin. A vibration level that causes annoyance will be well below the damage threshold for normal buildings. **Figure 3.10-1** illustrates human perceptions of typical vibration sources.

FIGURE 3.10-1: TYPICAL VIBRATION SOURCES AND SENSITIVITIES

Peak Ground Velocity (In/sec)	TYPICAL VIBRATION SOURCES			EFFECTS OF VIBRATION		
	Transportation Sources	Construction Sources	Natural Sources	Structural Damages	Human Perception	People and Equipment Tolerance
100			San Francisco, CA Earthquake 4/18/06 Santa Cruz, CA Earthquake 10/17/89		Intolerable	
10		Blasting at 50 ft.	Coalinga, CA Earthquake 5/2/83	Structural Damage Minor Damage	Extremely Unpleasant Very Unpleasant Unpleasant	Human Exposure 1 Minute
1.0		Pile Driving at 50 ft.	Typical Moonquake	Low Probability of Damage		1 Hours
0.1				Very Safe to Buildings		8 Hours 24 Hours
0.01	Subway Train (Measure above tunnel)	Truck or Dozer at 50 ft.			Strongly Noticeable	Computers
0.001	Motor Vehicle Traffic at 50 ft. on Rough Roadway and Elevated Highway	Jackhammer at 50 ft.			Easily Noticeable	
0.0001	Motor Vehicle Traffic at 50 ft. on Smooth Roadway and At-grade Highway	Blasting at 500 ft.	Micro-Meteorite Impacts at 50 ft.		Barely Perceptible	Residences
	Truck at 200 ft. on Rough Roadway	Pile Driving at 500 ft.			Imperceptible	Optical Microscopes Electron Microscopes

Source: Nugent & Amick, 1992.

The California Department of Transportation (Caltrans) measure of the threshold of architectural damage for conventional sensitive structures is 0.5-inch per second (in/sec) PPV for new residential structures and modern commercial buildings and 0.25 in/sec PPV for historic and older buildings. Caltrans vibration annoyance potential criteria characterize 0.1 in/sec PPV as “strongly perceptible” and 0.4 in/sec PPV as “severe” (Caltrans 2004).

In residential areas, the background vibration velocity level is usually approximately 0.0013 in/sec PPV. This level is well below the vibration velocity level threshold of perception for humans, which is approximately 0.0017 in/sec PPV. It is also the approximate dividing line

between barely perceptible and distinctly perceptible levels for many people is 0.0020 in/sec PPV.

3.10.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

The proposed TOD Plans are subject to a range of state and local plans, policies, and regulations, which are described below.

a. Federal Plans, Policies and Regulations

Noise

Department of Housing and Urban Development Noise Abatement and Control

The U.S. Department of Housing and Urban Development (HUD) environmental noise regulations are set forth in 24 Code of Federal Regulations (CFR), Part 51, Subpart B, Noise Abatement and Control. According to the regulations, “It is HUD’s general policy to provide minimum national standards applicable to HUD programs to protect citizens against excessive noise in their communities and places of residence.” These regulations include criteria for assessing whether a HUD project is suitable for a particular site, given the background noise levels. HUD has defined the suitability of a site for new housing construction based on existing noise levels as follows:

- Acceptable – 65 dB day-night average sound level (DNL) or less;
- Normally unacceptable – Exceeding 65 dB DNL but not exceeding 75 dB DNL; and
- Unacceptable – Exceeding 75 dB DNL.

The HUD regulations also include a goal (rather than a standard) that interior noise levels not exceed 45 dB DNL. Sound-attenuating features such as barriers or sound-attenuating building materials must be used to achieve the interior noise goal where feasible. Standard building construction generally provides 20 dB DNL of sound attenuation; therefore, if the exterior noise environment is classified as “acceptable,” according to HUD standards, the interior noise environment should not exceed 45 dB DNL. The HUD regulations also encourage the use of quieter construction equipment and methods.

Federal Aviation Regulations Part 150 - Noise

Federal Aviation Administration (FAA) Order 1050.1E, FAA Order 5050.4B, and Title 14 - Aeronautics and Space Chapter I - Federal Aviation Administration, Department of Transportation Subchapter I - Airports Part 150 - Airport Noise Compatibility Planning (FAR Part 150) provide the regulatory framework for noise related to aircraft operation. Appendix A

of FAR Part 150 states that “for the purpose of compliance with this part, all land uses are considered to be compatible with noise levels less than DNL (or CNEL in California) 65 dB. Local needs or values may dictate further delineation based on local requirements or determinations.”

Vibration

Federal Transit Administration (FTA) Vibration Standards

The FTA has adopted vibration standards that are used to evaluate potential building damage impacts related to construction activities (see **Table 3.10-2**).

TABLE 3.10-2: 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: Federal Transit Administration, 2006.

The FTA has also adopted standards for groundborne vibration impacts related to human annoyance (see **Table 3.10-3**). No thresholds have been adopted or recommended for commercial and office uses.

TABLE 3.10-3: GROUNDBORNE VIBRATION SENSITIVITY CRITERIA

Building Category	Frequent Events ¹	Occasional Events ²	Infrequent Events ³
Category 1: High Sensitivity. Buildings where vibration would interfere with interior operations (e.g., vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and research operations).	65 VdB ^d	65 VdB ^d	65 VdB ^d
Category 2: Residential uses and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB
Category 3: Institutional land uses, such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference	75 VdB	78 VdB	83 VdB

¹ More than 70 vibration events of the same source per day.

² Between 30 and 70 vibration events of the same source per day.

³ Fewer than 30 vibration events of the same kind per day.

Source: Federal Transit Administration, 2006.

b. State Plans, Policies, and Regulations**Noise**

Title 24, California Building Code

State regulations related to noise include requirements for the construction of new hotels, motels, apartment houses, and dwellings other than detached single-family dwellings. The requirements are intended to limit the extent of noise transmitted into habitable spaces. These requirements are collectively known as the California Noise Insulation Standards and are found in California Code of Regulations, Title 24 (known as the Building Standards Administrative Code), Part 2 (known as the California Building Code), Appendix Chapters 12 and 12A. For limiting noise transmitted between adjacent dwelling units, the noise insulation standards specify the extent to which walls, doors, and floor ceiling assemblies must block or absorb sound. For limiting noise from exterior sources, the noise insulation standards set forth an interior standard of DNL 45 dBA in any habitable room and, where such units are proposed in areas subject to noise levels greater than DNL 60 dBA, require an acoustical analysis demonstrating how dwelling units have been designed to meet this interior standard. If the interior noise level depends upon windows being closed, the design for the structure must also specify a ventilation or air conditioning system to provide a habitable interior environment. Title 24 standards are enforced through the building permit application process in the City of Inglewood (City).

Guidelines for Land Use and Noise Exposure

The California Department of Health Services has established guidelines for land use and noise exposure compatibility that are listed in **Table 3.10-4**.

In addition, the California Government Code (Section 65302(g)) requires a noise element to be included in general plans and requires that the noise element (1) identify and appraise noise problems in the community, (2) recognize Office of Noise Control guidelines, and (3) analyze and quantify current and projected noise levels.

Additionally, the state has noise limits for vehicles licensed to operate on public roads. For heavy trucks, the state pass-by standard is consistent with the federal limit of 80 dBA. The state pass-by standard for light trucks and passenger cars (less than 4.5 tons, gross vehicle rating) is also 80 dBA at 15 meters from the centerline. These standards are implemented through controls on vehicle manufacturers and by legal sanction of vehicle operators by state and local law enforcement officials.

TABLE 3.10-4: LAND USE AND NOISE EXPOSURE COMPATIBILITY (CNEL)

Land Use	Normally Acceptable ¹	Conditionally Acceptable ²	Normally Unacceptable ³	Clearly Unacceptable ⁴
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business & Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

¹ **Normally Acceptable:** Use is satisfactory for buildings of normal conventional construction without special noise insulation requirements.

² **Conditionally Acceptable:** New construction or development should be undertaken only after detailed analysis of noise reduction requirements and needed noise insulation features are provided. Conventional construction, with closed windows and fresh air supply systems or air conditioning will normally suffice.

³ **Normally Unacceptable:** New construction or development should generally be discouraged. If it does proceed, detailed analysis of noise reduction requirements must be made and needed noise insulation features provided.

⁴ **Clearly Unacceptable:** New construction or development should generally not be undertaken.

Vibration Standards

There are no state vibration standards applicable to the proposed TOD Plans. Although the Caltrans *Transportation and Construction Vibration Guidance Manual* (2013) does not provide official Caltrans standards for vibration, it does provide guidelines that can be used as screening tools to assess potential adverse vibration effects related to structural damage and human perception (see **Tables 3.10-5** and **3.10-6**, respectively).

TABLE 3.10-5: CALTRANS CRITERIA FOR VIBRATION DAMAGE POTENTIAL

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/ Frequent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: Caltrans, 2006.

TABLE 3.10-6: CALTRANS CRITERIA FOR VIBRATION ANNOYANCE POTENTIAL

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/ Frequent Sources
Barely Perceptible	0.04	0.01
Distinctly Perceptible	0.25	0.04
Strongly Perceptible	0.9	0.10
Severe	2.0	0.4

Source: Caltrans 2006.

c. Local Plans, Policies, and Regulations

City of Inglewood Municipal Code

Article 2 of the Inglewood Municipal Code, Noise Regulations, sets forth regulations concerning the generation and control of noise. Sections 5-27 and 5-30 of the Municipal Code establish base ambient noise levels and maximum residential exterior and interior noise levels. **Table 3.10-7** and **Table 3.10-8** show the base ambient noise levels and maximum residential exterior and interior noise levels, respectively. According to Section 5-27 of the Inglewood Municipal Code, actual measurements exceeding the noise levels at the time and within the zones identified in **Table 6.9-5** shall be employed as the base ambient noise level. In addition, no ambient noise shall be less than the noise level specified in **Table 3.10-7**.

Additional noise regulations set forth in the Inglewood Municipal Code include:

- **Section 5-31, Maximum Nonresidential Noise Levels.** Measured on the exterior of nonresidential properties, no noise level is permitted to exceed the respective base ambient noise levels for commercial and industrial land uses for a maximum cumulative duration of 30 minutes in any hour.

TABLE 3.10-7: BASE AMBIENT NOISE LEVELS

Decibels	Time	Land Use Zone
45 dBA	10:00 p.m. – 7:00a.m.	Residential
55 dBA	7:00 a.m. to 10:00 p.m.	Residential
65 dBA	Anytime	Commercial and uses not specified
75 dBA	Anytime	Industrial

Source: Inglewood Municipal Code, Section 5-27

TABLE 3.10-8: MAXIMUM RESIDENTIAL NOISE LEVELS

	Maximum Allowable Noise Level	Maximum Duration Period
Exterior Noise Levels		
(1)	Base Ambient Noise Level (BANL)	30 minutes in any hour
(2)	5 dBA above BANL	15 minutes in any hour
(3)	10 dBA above BANL	5 minutes in any hour
(4)	15 dBA above BANL	1 minutes in any hour
(5)	20 dBA above BANL	Not Permitted
Interior Noise Levels		
(1)	BANL	5 minutes in any hour
(2)	5 dBA above BANL	1 minutes in any hour
(3)	10 dBA above BANL	Not Permitted

Source: Inglewood Municipal Code, Section 5-2

- **Section 5-39, Machinery, Equipment, Fans and Air-Conditioning, Noise Regulated**, states that it is unlawful for any person to operate, cause to operate or permit the operation of any machinery, equipment, device, pump, fan, compressor, air-conditioning apparatus, or similar mechanical device in any manner so as to create any noise which would cause the noise level at the property line of any property to exceed the ambient noise base level by 5 dBA.
- **Section 5-41, Construction of Building and Projects, Noise Regulated**, states that is unlawful for any person within a residential zone, or within a radius of 500 hundred feet therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures, or projects or to operate any pile driver, pneumatic hammer, derrick, excavation or earth moving equipment, or other construction equipment between the hours of 8:00 pm and 7:00 am of the next day in such a manner that a reasonable person residing in the area is caused discomfort or annoyance unless a permit has been obtained from the Permits and Licenses Committee of the City.
- **Section 5-45, Excessive Train Horn Noise Prohibited**, states that it is unlawful for any person to operate or sound, or cause to be operated or sounded, between the hours of 10:00 pm and 7:00 am of the next day, a train horn or train whistle which creates a noise in excess of 90 dBA at any place or point 300 hundred feet or more distant from the source of such sound.

City of Inglewood General Plan

The City's General Plan Noise Element identifies the acceptability of noise exposure levels for different land uses. **Table 3.10-9, Noise Compatibility** (Exhibit 6 of the General Plan Noise Element), shows the land use compatibility standards for exterior and interior noise. The Noise

Element indicates that development projects should incorporate noise mitigation measures if they would exceed Normally Acceptable levels as defined by the guidelines. **Table 3.10-10** indicates the City's interior and exterior noise standards.

TABLE 3.10-9: CITY OF INGLEWOOD NOISE COMPATIBILITY GUIDELINES (CNEL)

Land Use Categories	Community Noise Equivalent Level (CNEL)					
	55	60	65	70	75	80
Residential – Single family, Multi-family, duplex	A	A	B	B	C	
Residential – Mobile homes	A	A	B	C	C	
Transient Lodging – Motels, Hotels	A	A	B	B	C	C
Schools, Libraries, Churches, Hospitals, Nursing Homes	A	A	B	C	C	
Auditoriums, Concert Halls, Amphitheater, Meeting Halls	B	B	C	C		
Sport Arenas, Outdoor Spectator Sport, Amusement Parks	A	A	A	B	B	
Playgrounds, Neighborhood Parks	A	A	A	B	C	
Golf Courses, Riding Stables, Cemeteries	A	A	A	A	B	C
Office and Professional Buildings	A	A	A	B	B	C
Commercial Retail, Banks, Restaurants, Theaters	A	A	A	A	B	B
Industrial, Manufacturing, Utilities, Wholesale, Service Stations	A	A	A	A	B	B
Agriculture	A	A	A	A	A	A

NOTES:

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 Conditionally Acceptable – New construction or development should be undertaken only after detailed analysis of the noise reduction requirement is 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.

Areas not identified as A, B, or C indicate new construction or development should generally not be undertaken.

Source: City of Inglewood General Plan, 1987.

TABLE 3.10-10 CITY OF INGLEWOOD INTERIOR AND EXTERIOR NOISE STANDARDS (CNEL)

Land Use	Interior	Exterior
Single-family, Duplex, Mobile Homes	45	65
Mobile Homes	-	65
Hotel, Motel, Transient Lodging	45	65
Commercial, Retail, Restaurant	55	---
Offices	45	---
Manufacturing, Warehousing, Wholesale	65	---
Hospitals, Schools	45	65
Parks	---	65

Source: City of Inglewood General Plan, 1987.

3.10.3 ENVIRONMENTAL SETTING

a. Sensitive Land Uses

Noise sensitive land uses are generally defined to include places where people sleep, such as residences, hospitals, and hotels; institutional land uses where it is important to avoid interference with speech or reading, including schools, libraries, and churches; and outdoor areas where quiet is fundamental to its specific use (i.e., amphitheaters and National Parks).

The Westchester/Veterans TOD Plan area consists primarily of industrial and commercial land uses. Residential multi-family land uses are located south of Metro's under-construction Crenshaw/LAX line and the Westchester/Veterans station. In addition, there are several areas that are defined as mixed-use corridors, which provide a range of uses that respond to the needs of both a pedestrian-friendly transit-oriented district and streets with high automobile volumes.

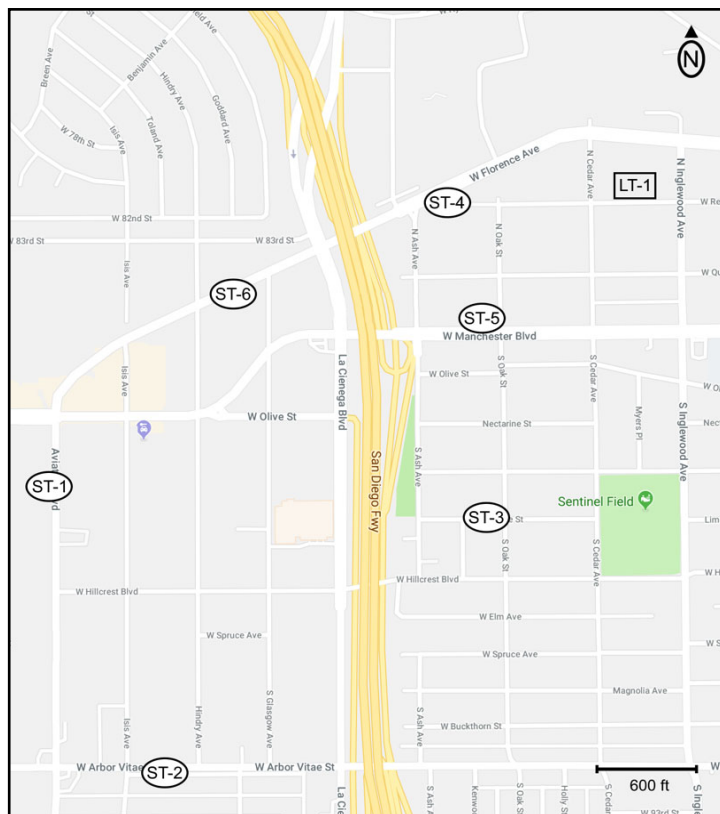
The Crenshaw/Imperial TOD Plan area encompasses lands within the City of Inglewood that are generally also within a half-mile radius of the Metro Green Line Crenshaw station, which is located in the City of Hawthorne. The current land uses in the corresponding TOD Plan area are mainly residential west of Crenshaw Boulevard, but also include commercial developments along Imperial Highway and Crenshaw Boulevard.

The TOD Plan areas are developed urban environments that include a substantial number of residential uses. Because the TOD Plans would implement infill and redevelopment within developed areas, the closest existing noise sensitive land uses are likely to be, at times, adjacent to the new development area. Thus, construction and operation of the proposed TOD Plans have the potential to impact existing and new sensitive receivers.

b. Existing Noise Measurements

Sources of noise in the City of Inglewood are typical of those found in urban developed areas including, but not limited to, traffic, construction work, commercial operations, human activities, emergency vehicles, aircraft overflights, etc. Two (2) long-term and ten (10) short-term noise measurements of existing ambient noise levels were taken within the TOD Plan areas on November 7 and 8, 2018 to characterize existing ambient noise levels. **Figure 3.10-2** and **Figure 3.10-3** indicate the locations of long and short-term noise measurements.

FIGURE 3.10-2: SHORT & LONG-TERM NOISE MEASUREMENTS - WESTCHESTER/VETERANS TOD PLAN AREA



The average noise over a 24-hour period was 59.5 dBA CNEL at long-term measurement location 1 (LT-1) within the Westchester/Veterans area and 64.4 dBA CNEL at long-term measurement location 2 (LT-2) within the Crenshaw/Imperial area. **Tables 3.10-11** through **3.10-13** list the hourly ambient noise levels for each long-term 24-hour measurement location. **Figures 3.10-3** and **3.10-4** show hourly ambient noise levels for each long-term 24-hour measurement. As shown in **Table 3.10-14**, the short-term noise measurements identified existing ambient noise at sensitive receiver's ranges between 58.6 L_{eq} and 71.6 L_{eq} within each of the TOD Plan areas.

FIGURE 3.10-3: SHORT & LONG-TERM NOISE MEASUREMENTS - CRENSHAW/IMPERIAL TOD PLAN AREA

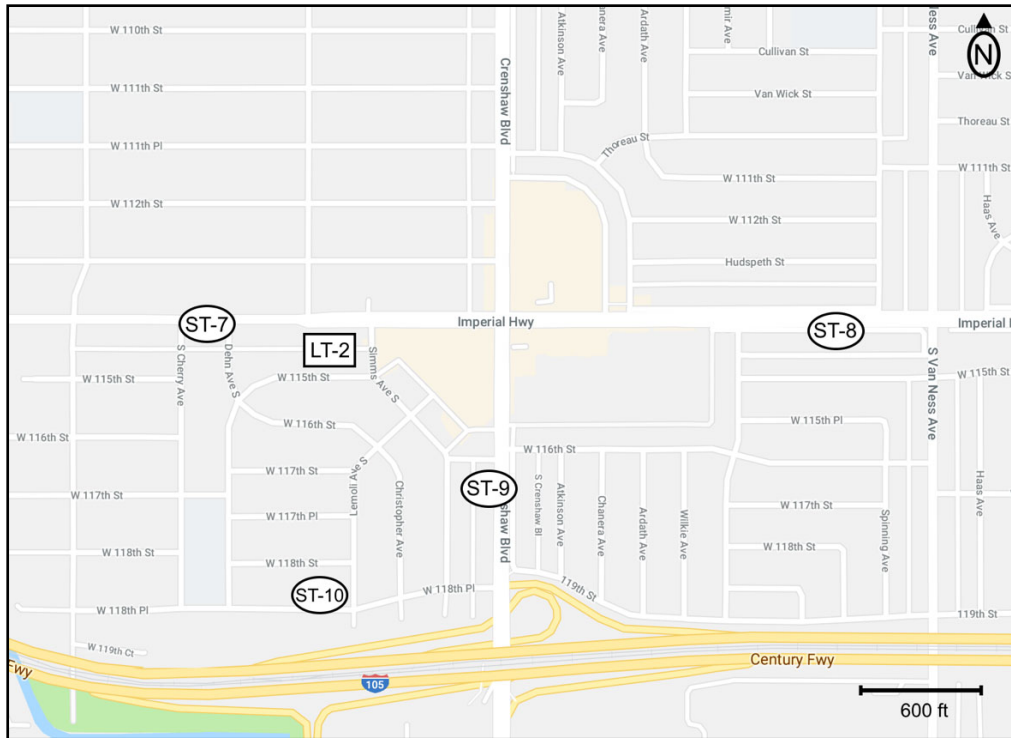


TABLE 3.10-11 SUMMARY OF LONG-TERM NOISE MEASUREMENTS AT LT-1 - WESTCHESTER/VETERANS AREA

Hour Beginning	dBA $L_{eq}[H]$	Hour Beginning	dBA $L_{eq}[H]$
12:00 AM	49	12:00 PM	59
1:00 AM	50	1:00 PM	60
2:00 AM	47	2:00 PM	59
3:00 AM	49	3:00 PM	60
4:00 AM	48	4:00 PM	59
5:00 AM	50	5:00 PM	60
6:00 AM	55	6:00 PM	58
7:00 AM	56	7:00 PM	56
8:00 AM	57	8:00 PM	53
9:00 AM	58	9:00 PM	53
10:00 AM	59	10:00 PM	51
11:00 AM	57	11:00 PM	52

TABLE 3.10-12 SUMMARY OF LONG-TERM NOISE MEASUREMENT AT LT-2 - CRENSHAW/IMPERIAL AREA

Hour Beginning	dBA Leq[H]	Hour Beginning	dBA Leq[H]
12:00 AM	54	12:00 PM	49
1:00 AM	52	1:00 PM	49
2:00 AM	53	2:00 PM	58
3:00 AM	54	3:00 PM	52
4:00 AM	61	4:00 PM	53
5:00 AM	61	5:00 PM	53
6:00 AM	61	6:00 PM	54
7:00 AM	50	7:00 PM	52
8:00 AM	54	8:00 PM	53
9:00 AM	53	9:00 PM	55
10:00 AM	51	10:00 PM	54
11:00 AM	49	11:00 PM	57

FIGURE 3.10-4: LONG-TERM (LT-1) NOISE MEASUREMENTS WESTCHESTER/VETERANS TOD PLAN AREA

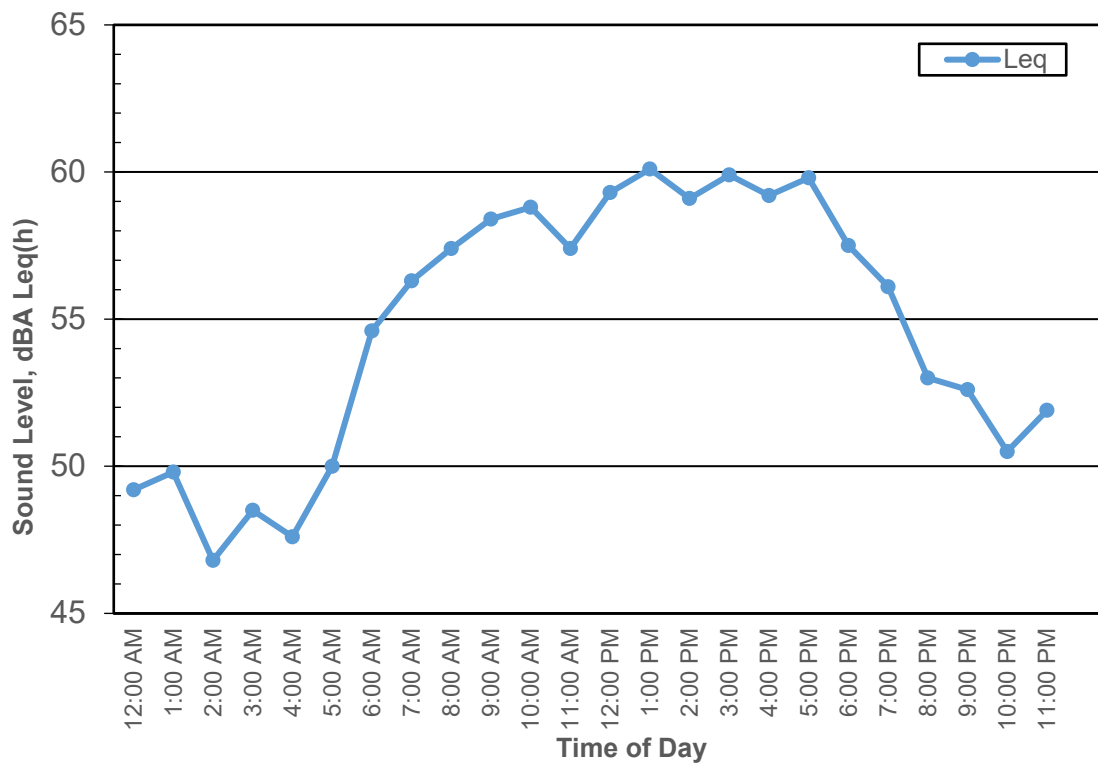


FIGURE 3.10-5: LONG-TERM (LT-2) NOISE MEASUREMENT CRENSHAW/IMPERIAL TOD PLAN AREA

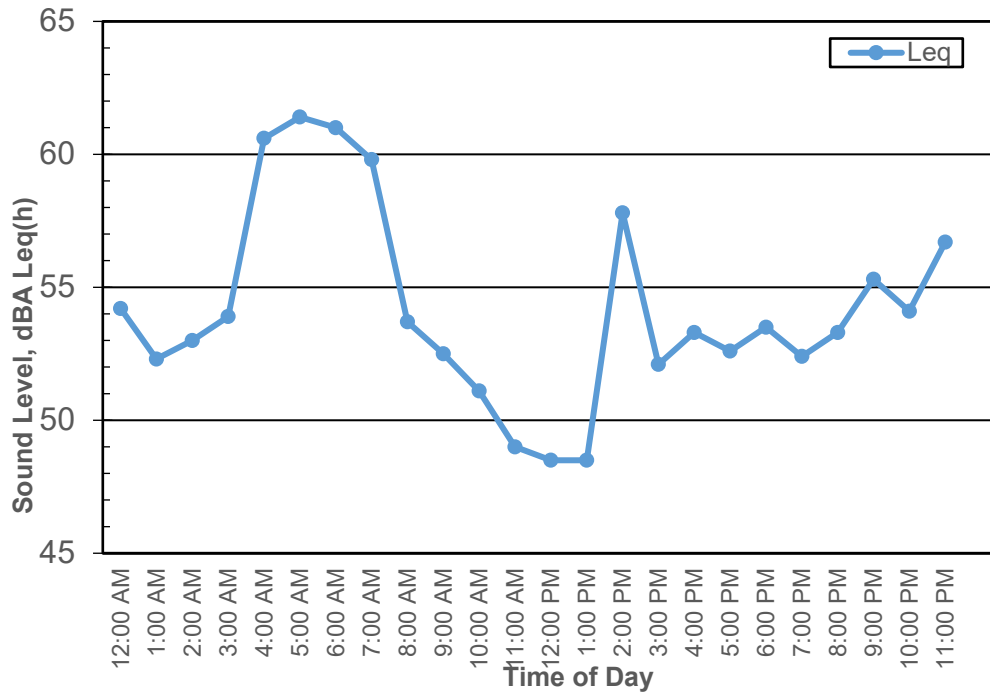


TABLE 3.10-13: SUMMARY OF EXISTING (AMBIENT) LONG-TERM (24-HOUR) NOISE LEVEL MEASUREMENTS¹

Noise Monitoring Location ID ²	Description	Hourly Noise Levels (1hr-L _{eq}) ³				24-hour Noise Levels (CNEL)
		Daytime Minimum	Daytime Maximum	Nighttime Minimum	Nighttime Maximum	
A	Front of 425 Regent Street (Westchester/Veterans Area)	52.6	60.1	46.8	54.6	59.5
B	Rear yard of 3319 W. 115 th Street (Crenshaw/Imperial TOD Area)	48.5	59.8	52.3	61.4	64.4

1 Noise measurement taken on November 7 and 8, 2018.

2 See Figures 3.10-1 and 3.10-2 for locations of the monitoring sites, and Appendix xxx for Field Monitoring Forms.

3 Taken with Larson Davis Type 1 noise meter

TABLE 3.10-14: SUMMARY OF EXISTING SHORT-TERM NOISE MEASUREMENTS¹

Noise Monitoring Location ID ²	Description	Time of Measurement ³	Primary Noise Source	Noise Levels (L _{eq} dBA)
Westchester/Veterans TOD Plan Area				
1	8635 Aviation Boulevard, on the west edge of the Westchester/Veterans TOD Plan area boundary	8:34	Traffic	68.1
2	1009 W Arbor Vitae Street, on the south edge of the Westchester/Veterans TOD Plan area boundary	8:58	Traffic and Aircraft	67.9
3	612 Lime Street, near the southeast edge of the Westchester/Veterans TOD Plan area boundary	9:33	Aircraft	66.8
4	613 Manchester Boulevard, east of the I-405 freeway, near the Westchester/Veterans TOD Plan area center	10:00	Traffic	65.0
5	West end of Regent Street adjacent to W. Florence Avenue, near the center of the Westchester/Veterans TOD Plan area	10:32	Traffic	64.9
6	936 Florence Avenue, on the northwest edge of the Westchester/Veterans TOD Plan area boundary	11:12	Traffic	67.4
Crenshaw/Imperial TOD Plan Area				
7	3412 Imperial Highway, near the northwest edge of the Crenshaw/Imperial TOD Plan area boundary	13:19	Traffic	71.6
8	2406 Imperial Highway, west of the Crenshaw/Imperial TOD Plan area boundary	13:50	Traffic	65.2
9	11615 Crenshaw Boulevard, near the south edge of the Crenshaw/Imperial TOD Plan area boundary	14:16	Traffic	69.7
10	3321 119 th Street, near the south edge of the Crenshaw/Imperial TOD Plan area boundary	14:39	Traffic	58.6
Notes:				
1 Noise measurement taken on November 7, 2018.				
2 See Figures 3.10-1 and 3.10-2 for locations of the monitoring sites, and Appendix A for Field Monitoring Forms.				
3 Taken with Larson Davis Type 1 noise meter				

Source: Entech 2018

c. Existing Roadway Noise Levels

Existing roadway noise levels were calculated for 17 roadway segments that would be most directly affected by traffic from site-specific development projects permitted by the TOD Plans.

These roadway segments are located within the TOD Plan areas and would experience the greatest percentage increase in daily traffic when compared to roadways located outside of the TOD Plan areas.

Calculation of the existing roadway noise levels was accomplished using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108) and traffic volumes at the study intersections analyzed in the TLOD Plans' traffic study (Iteris 2018). The model calculates the average noise level at specific locations based on traffic volumes, average speeds, and site environmental conditions. The existing average daily noise levels along these roadway segments are presented in **Table 3.10-15**.

d. Airport Noise Levels

The southwestern boundary of the Westchester/Veterans TOD Plan area is approximately 0.6 miles northeast of the Los Angeles International Airport (LAX). As shown in **Figure 3.10-6**, much of the TOD Plan area is subject to noise levels of LAX in excess of 65 dB CNEL, with a relatively large area west of the I-405 freeway within the 70 dB CBEL noise contour.

The Crenshaw/Imperial TOD Plan area is located across the I-105 freeway approximately 800 feet from the Hawthorne Municipal Airport. The 65 dB CNEL noise contour of Hawthorne Municipal Airport does not extend north of the I-105 freeway and does not, therefore affect the Crenshaw/Imperial TOD Plan area.

TABLE 3.10-15 EXISTING ROADWAY NOISE LEVELS

Roadway Segment	Land Use Types	Existing ADT	Existing CNEL ^a
Market Street between Florence and Regent	Retail, Residential Multi-Family, Office, Flex, R&D, Light Industrial, Warehousing	12,583	68.3
Florence Avenue between Ash and Oak	Light Manufacturing, Residential Multi-Family	29,836	73.9
La Cienega Boulevard between Florence Avenue and Manchester Boulevard	Office, Flex, R&D, Light Industrial Warehousing	47,163	75.0
Florence Avenue between Hindry and Glasgow	Light Manufacturing, Office, Flex, R&D, Light Industrial, Warehousing, Residential, Retail, Transit-Oriented Development	42,282	74.9
Market Street between Queen and Manchester Boulevard	Residential Multi-Family, Mixed Use Corridor	16,949	69.4
Manchester Boulevard between Hindry and Glasgow	Mixed Use Corridor, Light Industrial, Office, Flex, R&D, Light Industrial, Warehousing	10,966	68.2
Manchester Boulevard between Ash and Oak	Mixed Use Corridor	38,151	73.2
Aviation Boulevard between Manchester Boulevard and Arbor Vitae Street	Mixed Use Corridor	29,488	72.3
Arbor Vitae Street between Isis and Hindry	Light Industrial	18,008	71.9
Century Boulevard between Prairie and Doty	Retail, Light Industrial	46,789	74.0
Century Boulevard between Doty and Yukon	Retail, Light Industrial	46,367	73.8
104 th Street between Prairie Avenue and Doty	Residential Multi-Family	685	55.5
104 th Street between Doty and Yukon	Residential Multi-Family	610	54.9
Crenshaw Boulevard between Imperial Highway and 113 th Street	General Commercial	55,818	74.9
Imperial Highway between Cherry and Dehn	Mixed Use Corridor	30,683	72.6
Imperial Highway between Casimir and Van Ness	Residential Multi-Family, General Commercial	46,208	73.8
Crenshaw Boulevard between I-105 and 116 th Streets	Residential Multi-Family, General Commercial	40,517	73.9

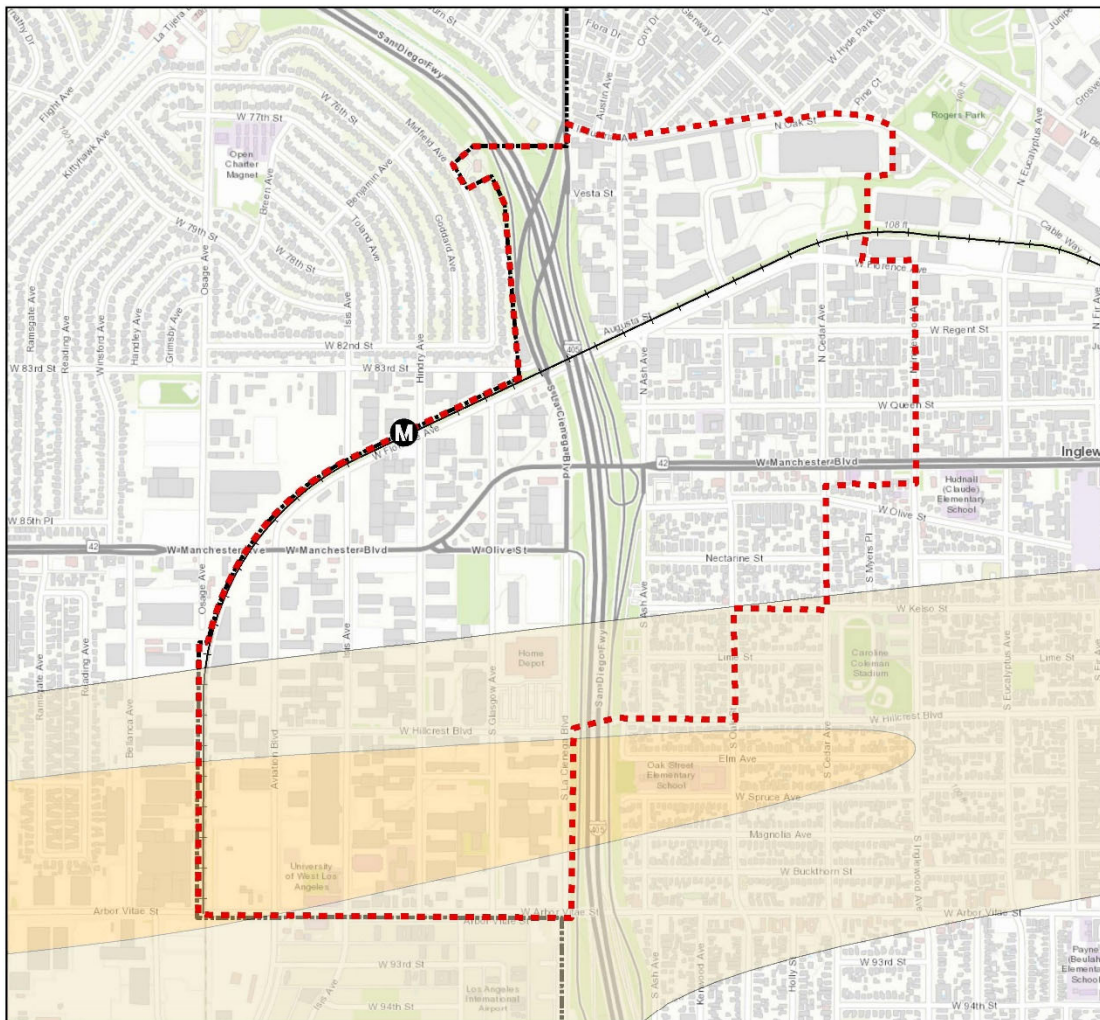







FIGURE 3.10-6

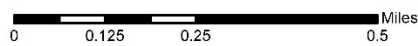
WESTCHESTER/VETERANS

LAX CNEL Noise Contours

-  City of Inglewood Boundary
-  Westchester/Veterans TOD Plan Area
-  Crenshaw/LAX Line

Noise Contours

-  65 dB
-  70 dB



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3.10.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of noise and vibration impacts. Appendix G of the CEQA Guidelines indicates that a project would have a significant effect if it were to:

- Threshold NOI-1** Generate substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local (City of Inglewood) general plan or noise ordinance, or applicable standards of other affected agencies;
- Threshold NOI-2** Generate excessive groundborne vibration or groundborne noise levels;
or
- Threshold NOI-3** Expose people residing or working in the project area to excessive airport-related noise levels².

3.10.5 IMPACTS AND MITIGATION MEASURES

Threshold NOI-1: Generate substantial temporary or permanent increase in ambient noise levels in excess of established standards.

Impact NOI-1.1: Site-specific development projects permitted by the proposed TOD Plans would result in temporary increases in noise levels during construction exceeding applicable noise standards. With implementation of EIR mitigation measures, this impact would be *significant but mitigable*.

Methodology

For the purpose of this analysis, an estimate of construction noise levels was conducted based on the general assessment approach recommended by the FTA. The FTA's general construction noise assessment approach recommends assessing the two noisiest pieces of construction equipment operating concurrently at the center of a construction site (FTA, 2006). The maximum noise level was predicted at a reference distance 50 feet from the boundary of a construction site, which would be representative of construction noise experienced by nearby residential homes.

² CEQA Guidelines Appendix G apply this threshold projects located within an airport land use plan, or where such a plan has not been adopted, within 2 miles of a public airport or public use airport. The Westchester/Veterans TOD Plan area is within 2 miles of Los Angeles International Airport and the Crenshaw/Imperial airport is located across the I-105 freeway from the Hawthorne Municipal Airport.

The specific timing and sequencing of individual site-specific development projects within the TOD Plan areas cannot be determined at this time. It is anticipated that such development would be market driven in response to the existing and future needs of the City's residential, commercial, and light industrial markets over a 20-year build out period. As such, it is expected that the proposed construction activities within the TOD Plan areas would occur at various short-term locations throughout the course of 20-year planning period. It is conservatively estimated that as much as 10 percent of the development permitted by the TOD Plans might be undergoing some stage of development (demolition, site preparation, and construction) on the theoretical "maximum construction day." Anticipated development activities during such a theoretical "maximum construction day" are indicated in **Table 3.10-18**, below.

TABLE 3.10-18: THEORETICAL MAXIMUM CONSTRUCTION DAY

	Residential Units	Non-Residential Square Footage	Acres	# of Sites
Westchester/Veterans				
Demolition (buildings)	4	46,500		2
Site Preparation (clearing and grading)			4.4	2
Construction (Buildings)	114	142,200		2
(Paving of Parking and Roads)			3.2	2
Crenshaw/Imperial				
Demolition (buildings)	8	66,340		2
Site Preparation (clearing and grading)			6.3	3
Construction (Buildings)	306	42,180		3
(Paving of Parking and Roads)			4.2	3
TOD PLANS TOTAL				
Demolition (buildings)	12	112,840		4
Site Preparation (clearing and grading)			10.5	4
Construction (Buildings)	420	184,380		4
(Paving of Parking and Roads)			7.4	5

Source: Entech 2018

As described above, the significance of a project's noise impacts is determined by comparing estimated project-related noise levels to applicable noise exposure standards. A significant noise impact would occur if the proposed TOD Plans would result in a noise increase that would exceed the standards of the City's Municipal Code.

Impact Assessment

Construction noise impacts associated with each new individual development would be short-term in nature and limited to the period of time when construction activity is taking place for that particular development. Development of future land uses would generally involve construction phases such as demolition, grading/excavation, building construction, and asphalt paving.

Construction, although typically short-term, can be a significant source of noise. Construction is most significant when it takes place near sensitive land uses, occurs at night, or in early morning hours. The construction activity noise levels at and near site-specific development projects within the TOD Plan areas would fluctuate depending on the particular type, number, and duration of uses of various pieces of construction equipment. Generally, most, if not all, new site-specific development projects would require the use of heavy construction equipment for activities such as site demolition, grading and excavation, installation of utilities, paving, and building fabrication. Development activities would also involve the use of smaller power tools, generators, and other sources of noise. During each stage of construction for each site-specific development project, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of the activity.

The FHWA has compiled data for outdoor noise levels for typical construction activities. **Table 18** provides average (L_{eq}) noise levels produced by various types of construction equipment at a distance of 50 feet between the equipment and noise receptor. These noise levels would diminish rapidly with distance from a construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA L_{eq} measured at 50 feet from the noise source to the receptor would reduce to 78 dBA L_{eq} at 100 feet from the source to the receptor and reduce by another 6 dBA L_{eq} to 72 dBA L_{eq} at 200 feet from the source to the receptor.

TABLE 3.10-19 CONSTRUCTION EQUIPMENT NOISE LEVELS

Construction Equipment	Noise at 50 Feet (dBA, L_{eq})
Air Compressor	81
Backhoe	80
Ballast Tamper	83
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Dozer	85
Generator	81
Grader	85
Jack Hammer	88
Loader	85
Paver	89
Pneumatic Tools	85
Pump	76
Rock Drill	98
Roller	74
Saw	76
Scraper	89
Shovel	82
Truck	88

Source: Entech 2018

The construction activities for each new development that would occur under the proposed TOD Plans would expose the nearby existing uses to increased noise levels. Because the TOD Plan areas are higher density, fully developed urban areas and the TOD Plans propose mixed-use land uses that would be implemented through market demands over a 20-year planning period, construction of new developments could be located less than 50 feet from a sensitive receptor, such as existing residential units. Consequently, construction that occurs immediately adjacent to these existing receptors would generate noise levels that would be substantially greater than the existing ambient noise levels at these receptor locations.

Based on the noise levels for general outdoor construction activities shown in **Table 3.10-19**, noise levels at sensitive receptors that are located within 50 feet of a site-specific development project permitted by the proposed TOD Plans could reach up to 98 dBA L_{eq} or above. However, this noise level is not anticipated to occur throughout the entire course of a construction day, because construction equipment and activities rarely operate continuously for a full day at a

construction site. Typically, the operating cycle for construction equipment would involve one or two minutes of full power operation followed by three or four minutes at lower power settings. Additionally, construction equipment engines would likely be intermittently turned on and off over the course of a construction day.

Per Sections 5-41 of the City's Municipal Code, noise sources associated with construction are exempted from the City's established noise standards as long as they do not take place between the hours of 8:00 pm and 7:00 am. All new development projects in the TOD Plan areas would be subject to these regulations, and the construction activities related to the TOD Plans would be consistent with the City's Municipal Code. Thus, site-specific development projects permitted by the TOD Plans would comply with the City's construction related noise standards.

As previously described, construction noise levels would expose the neighboring land uses to increased noise levels over existing ambient noise levels. In summary, the TOD Plan's estimated construction noise levels could reach approximately 98 dBA L_{eq} at adjacent residential uses during construction activities. However, the increase in noise levels related to construction activities would be temporary in nature and spread out at different site-specific development locations throughout the TOD Plan area over the 20-year buildout period of the Plan. Thus, the TOD Plan would not generate continuously high noise levels, although occasional single-event disturbances from demolition and construction activities are possible. In addition, the operation of each piece of construction equipment at construction sites would not be constant throughout the construction day, as equipment would be turned off when they are not in use. The typical operating cycle for a piece of construction equipment would involve one or two minutes of full power operation followed by three or four minutes at lower power settings.

Nonetheless, ambient exterior noise levels at the adjacent residential uses would experience a substantial increase in noise levels during site construction activities. Therefore, **Mitigation Measures NOI-1.1a** through **NOI-1.1g** are provided, which require the use of noise reduction devices and techniques during sit construction activities and include the use of noise barriers that when utilized to obstruct the direct line-of-sight between a construction area and a receptor provides approximately 5 dBA reduction in noise levels. Implementation of these measures would reduce the construction-related noise levels and ensure that flexible noise generating activities are not located adjacent to the existing sensitive noise receptors.

Significance Conclusion for Impact NOI-1.1

Because the ambient exterior noise levels at the adjacent residential uses would experience a substantial increase in noise levels during site construction activities, a significant impact related to generation of a substantial temporary or periodic increase in ambient noise levels in the vicinity of site-specific development and infrastructure projects permitted by the TOD Plans above levels existing without such development would occur.

Mitigation Measures

Mitigation Measure NOI-1.1a: All noise-producing demolition and construction activities shall be restricted to the hours from 7:00 am to 7:00 pm on weekdays and on Saturdays between the hours of 9:00 am and 5:00 pm. In order to reduce potential annoyance to persons using the nearby church and cemetery facilities, no noise-producing construction and demolition activities shall take place on Sundays and holidays.

Implementation: Approvals of site-specific development projects are to be conditioned upon compliance with this mitigation measure.

Mitigation Measure 4-1.1b: Stationary construction equipment shall be placed such that emitted noise is directed away from sensitive receptors nearest the construction site.

Implementation: Approvals of site-specific development projects are to be conditioned upon compliance with this mitigation measure.

Mitigation Measure 4-1.1c: Internal combustion engine-driven equipment shall be equipped with appropriate sound muffling devices, which are properly maintained and used at all times such equipment is in operation.

Implementation. As part of the review of proposed construction permits for site-specific development projects, the City will review the project developer's contract specifications to ensure that requirements for use of appropriate sound muffling devices are provided.

Mitigation Measure 4-1.1d: Quiet models of air compressors and other stationary noise sources shall be employed where such technology is commercially available.

Implementation. As part of the review of proposed construction permits for site-specific development projects, the City will review the project developer's contract specifications to ensure that requirements for use of quiet models of air compressors and other stationary noise sources are provided.

Mitigation Measure 4-1.1e: On-site equipment staging areas shall be located so as to maximize the distance between construction-related noise sources and noise sensitive receptors nearest the project site during construction.

Implementation: Approvals of site-specific development projects are to be conditioned upon compliance with this mitigation measure

Mitigation Measure 4-1.1f: Unnecessary idling of internal combustion engines shall be prohibited.

Implementation. As part of the review of proposed construction permits for site-specific development projects, the City will review the project developer's contract specifications to ensure that requirements for prohibiting unnecessary idling of internal combustion engines on construction sites are provided.

Mitigation Measure 4-1.1g: During the demolition and site preparation phases of construction, temporary sound barriers a minimum of 8 feet in height shall be placed around the property boundary project property lines to block the line of sight between on-site stationary construction equipment and any adjacent residential or school uses. These temporary sound barriers shall have a minimum Sound Transmission Class (STC) rating of 32 STC.

Implementation: Approvals of site-specific development projects are to be conditioned upon compliance with this mitigation measure.

Conclusion with Implementation of Mitigation Measures

As site-specific project construction would only occur during daytime hours and comply with the City's noise regulations in the Municipal Code, the temporary noise impacts during site construction would be reduced to a less-than-significant level with implementation of **Mitigation Measures NOI-1.1a through NOI-1.1g.**

Threshold NOI-1: Generate substantial temporary or permanent increase in ambient noise levels in excess of established standards.

Impact NOI-1.2: The types of non-residential uses that would occur within the mixed-use settings proposed by the TOD Plans do not typically generate noise levels incompatible with nearby residential uses. However, such mixed-use development might generate higher noise levels than currently exist adjacent to existing sensitive uses. Compliance with Article 2, Section 5-30 of the City Zoning Code would avoid significant impacts related to exceeding the City's exterior noise standards. Impacts *would be less than significant* in relation to land use compatibility.

Although new site-specific development projects permitted by the TOD Plans would increase traffic volumes in the TOD Plan areas, increased noise from such development would result in minor or no increase in average daily noise levels. Impacts *would be less than significant* in relation to roadway noise.

Methodology

For the purpose of determining whether the proposed TOD Plans would generate noise levels that exceed established noise standards, construction and stationary operational noise levels associated with the proposed TOD Plans were compared to the City of Inglewood noise standards set forth in Section 3.10.2, *Applicable Plans, Policies, and Regulations*. A significant impact was determined to result if noise levels associated with the proposed TOD Plans would exceed the City's noise standards during construction or subsequent operations.

Roadway Noise Levels

Roadway noise levels were calculated for TOD Plan areas roadway segments based on information provided in the Traffic Impact Analysis prepared for the proposed TOD Plan (Iteris, 2018). The roadway segments selected for analysis are those that were expected to be most directly impacted by traffic from site-specific development and infrastructure projects permitted by the TOD Plans, and includes roadways located within the TOD Plan areas. These roadways, when compared to roadways located outside of the TOD area, would experience the greatest percentage increase in traffic generated by the proposed TOD Plan. The noise levels were calculated using the FHWA's Highway Traffic Noise Prediction Model (FHWA-RD-77-108) and traffic volumes from the Traffic Study (Iteris, 2018).

Impact Assessment

Noise/Land Use Compatibility

With respect to operational noise levels, the City has established exterior noise standards that are correlated with land use zoning classifications, which are shown in **Table 3.10-10**. The exterior noise standards are 65 dBA CNEL for noise sensitive land uses, such as residences and 70 dBA CNEL for commercial/industrial land uses.

The TOD Plans would introduce new land uses that might generate higher noise levels than currently exist adjacent to existing sensitive uses. However, the noise environment in a high density, urban, walkable mixed-use transit-oriented environment is anticipated to be louder than other areas in the City that consist of low-density residential uses. Article 2, Section 5-30 of the City Zoning Code provides maximum noise volumes and duration periods that if exceeded would result in noise impacts, and the City's General Plan provides Noise compatibility guidelines (listed in **Table 3.10-9**), development of new land uses pursuant to the existing City General Plan and Municipal Code guidelines would reduce the potential for new land uses to exceed the City's exterior noise standards.

Through the City's environmental and the development permit processes, each site-specific development project permitted by the TOD Plans will be analyzed to ensure that operational noise levels generated by the proposed site-specific development would not exceed the City's noise standards. Overall, development permits are approved pursuant to the applicant's compliance with Inglewood Municipal Codes related to noise, which have been developed to reduce noise impacts to acceptable levels.

Roadway Noise

Ambient noise levels within and surrounding the TOD Plan areas are influenced primarily by traffic on local roadways with the exception of the southwestern portion of the Westchester/Veterans TOD Plan area affected by LAX airport noise. Additionally, the Metro passenger trains that will run through the Westchester/Veterans Metro station on a daily basis will also be a noise source of noise in that TOD Plan area.

With respect to traffic noise levels, the existing noise levels on roadway segments located within and in the vicinity of the TOD Plan areas, as shown in **Table 3.10-15**, range from 54.9 dBA CNEL to 75.0 dBA CNEL at 50 feet from the centerline of the roadway segments. This roadway modeling provides a representative indication of the current noise levels within the TOD Plan areas.

The increase in traffic resulting from site-specific development projects permitted by the TOD Plans would increase ambient noise levels along area roadways. To evaluate the future traffic

noise environment within the TOD Plan areas, the future traffic noise levels on the roadways located within the TOD Plan areas were estimated based on future traffic volumes provided in the TOD Plans' traffic study.

The noise levels were calculated using the FHWA's Highway Traffic Noise Prediction Model (FHWA-RD-77-108) and traffic volumes from the traffic impact analysis report (Iteris 2018). As shown in **Table 3.10-15**, the majority of the roadway segments where existing noise levels range from 68 to 75 dBA CNEL are near commercial/industrial land use zones and heavily traveled arterials. These noise levels are considered Conditionally Acceptable. Roadway segments where existing noise levels are around 55 dBA CNEL are in land use zones for residential areas. These noise levels are considered Normally Acceptable.

For the Westchester/Veterans TOD Plan area, the majority of the roadway segments do not experience noticeable changes in noise levels from the TOD Plan over existing levels and remain within their respective Community Noise Exposure Levels. A few segments experience a slight decrease in noise levels as future percentage of truck traffic decrease.

For the Crenshaw/Imperial TOD Plan area, traffic from future residential and retail development will increase roadway noise by approximately 1.0 dBA CNEL, which would not exceed the noise limits in the City's Municipal Code.

Similarly, as shown in **Table 3.10-16**, future without project noise levels continue to remain in the Conditionally Acceptable range (68 to 75 dBA CNEL) near commercial/office building land use zones and heavily traveled arterials in the Westchester/Veterans TOD Plan area. Future without project noise levels also remain near Normally Acceptable levels for residential areas near 104th Street.

A majority of the roadway segments would not experience noticeable changes in noise levels from the TOD Plans over future no project levels and would remain within their respective Community Noise Exposure Categories. A few roadway segments experience would a slight decrease in noise levels as the future percentage of truck traffic on area roadways decreases. The build out for the TOD Plans would increase noise levels by a maximum of 0.5 dBA CNEL, which would not exceed the noise limits in the City's Municipal Code.

TABLE 3.10-15: TRAFFIC NOISE LEVELS: EXISTING PLUS PROJECT CONDITIONS

Segment	Existing Plus Project Land Use Types	Existing CNEL	Existing with Project CNEL	Increase/ (Decrease)
Westchester/Veterans TOD Plan Area				
Florence Ave between Ash and Oak	Light Manufacturing, Residential Multi-Family	73.9	74.2	0.3
La Cienega Blvd between Florence and Manchester	Office, flex, R&D, light industrial and warehousing	75.0	75.8	0.8
Florence Ave between Hindry and Glasgow	Light Manufacturing, office, flex, R&D, light industrial and warehousing, residential and retail transit-oriented development	74.9	74.9	0.0
Manchester Blvd between Hindry and Glasgow	Mixed Use Corridor, Light Industrial, office, flex, R&D, light industrial and warehousing	68.2	68.0	(0.2)
Manchester Blvd between Ash and Oak	Mixed Use Corridor	73.2	73.3	0.1
Aviation Blvd between Manchester and Arbor Vitae	Mixed Use Corridor	72.3	72.4	0.1
Arbor Vitae St between Isis and Hindry	Light Industrial	71.9	71.8	(0.1)
Crenshaw/Imperial TOD Plan Area				
Crenshaw Blvd between Imperial and 113 th	Residential Multi-family, General Commercial	74.9	74.9	0.0
Imperial Hwy between Cherry and Dehn	Mixed Use Corridor (range of uses that respond to the needs of both a pedestrian-friendly transit-oriented district and the streets with high automobile volumes), Multi-family, Single-family	72.6	72.6	0.0
Imperial Hwy between Casimir and Van Ness	Residential Multi-family, General Commercial	73.8	73.9	0.1
Crenshaw Blvd between I-105 and 116 th	Residential Multi-family, General Commercial	73.9	73.8	(0.1)

Source: Entech 2018

TABLE 3-10-16: TRAFFIC NOISE LEVELS: CUMULATIVE FUTURE PLUS PROJECT CONDITIONS

Segment	Land Use Type	Existing CNEL	Existing with Project CNEL	Increase
Westchester/Veterans TOD Plan Area				
Florence Ave between Ash and Oak	Light Manufacturing, Residential Multi-Family	73.9	74.3	0.4
La Cienega Blvd between Florence and Manchester	office, flex, R&D, light industrial and warehousing	75.3	75.8	0.5
Florence Ave between Hindry and Glasgow	Light Manufacturing, office, flex, R&D, light industrial and warehousing, residential and retail transit-oriented development	74.2	74.1	(0.1)
Manchester Blvd between Hindry and Glasgow	Mixed Use Corridor, Light Industrial, office, flex, R&D, light industrial and warehousing	69.4	68.4	(1.0)
Manchester Blvd between Ash and Oak	Mixed Use Corridor	73.1	73.2	0.1
Aviation Blvd between Manchester and Arbor Vitae	Mixed Use Corridor	72.9	72.9	0.0
Arbor Vitae St between Isis and Hindry	Light Industrial	73.8	73.8	0.0
Crenshaw/Imperial TOD Plan Area				
Crenshaw Blvd between Imperial and 113 th	Residential Multi-Family, General Commercial	75.3	75.3	0.0
Imperial Hwy between Cherry and Dehn	Mixed Use Corridor (range of uses that respond to the needs of both a pedestrian-friendly transit-oriented district and the streets with high automobile volumes), Multi-family, Single-family	72.5	72.4	(0.1)
Imperial Hwy between Casimir and Van Ness	Residential Multi-family, General Commercial	73.6	73.6	0.0
Crenshaw Blvd between I-105 and 116 th	Residential Multi-family, General Commercial	74.6	74.5	(0.1)

Source: Entech 2018

Significance Conclusion for Impact NOI-1

The types of commercial uses that would occur within the mixed-use settings proposed by the TOD Plans do not typically generate noise levels incompatible with nearby residential uses. However, such mixed-use development might generate higher noise levels than currently exist adjacent to existing sensitive uses. Compliance with Article 2, Section 5-30 of the City Zoning Code would avoid significant impacts related to exceeding the City's exterior noise standards. Although new site-specific development projects permitted by the TOD Plans would increase traffic volumes in the TOD Plan areas, increased noise from such development would result in minor or no increase in average daily noise levels. Impacts would therefore be less than significant.

Threshold NOI-2: Generate excessive groundborne vibration or groundborne noise levels.

Impact NOI-2.1: Construction of site-specific development projects permitted by the proposed TOD Plans would result in groundborne vibration levels that would exceed annoyance and potential damage thresholds during construction. Mitigation Measures NOI-2.1a and NOI-2.1b prohibit the use of construction equipment that generates high levels of vibration within specified distances from existing sensitive land uses and ensures that the construction-related vibration impacts would be reduced to a less than significant level. Mitigation Measure NOI-2.1c protects historic structures within the TOD Plan areas from construction of adjacent site-specific development. Impacts are therefore *significant but mitigable*.

Methodology

State *CEQA Guidelines* do not define the levels at which groundborne vibration or groundborne noise would be considered “excessive.” The City does not have a significance threshold to assess vibration impacts during construction. Additionally, there are no federal, state, or local vibration regulations or guidelines directly applicable to the proposed TOD Plans. However, publications of the FTA and Caltrans are two of the seminal works for the analysis of vibration relating to transportation and construction-induced vibration. The proposed TOD Plans are not subject to FTA or Caltrans regulations; nonetheless, these guidelines serve as a useful tool to evaluate vibration impacts. For the purpose of this analysis, the vibration criteria for structural damage and human annoyance established in the most recent Caltrans’ *Transportation and Construction Vibration Guidance Manual* (2013).

Groundborne vibration levels resulting from construction activities were estimated using data published by the FTA in its *Transit Noise and Vibration Impact Assessment* (2006) document. Potential vibration levels resulting from demolition and construction activities are identified at the nearest off-site sensitive receptor location, which for the purpose of this analysis is assumed to be an adjacent sensitive use, such as a residence. The potential vibration levels at off-site sensitive locations resulting from implementation of the proposed TOD Plan are analyzed against the vibration thresholds established by Caltrans to determine whether vibration levels would exceed the significance criteria identified above.

Impact Assessment

Construction activities for site-specific development projects permitted by the proposed TOD Plans would include demolition, excavation, and grading activities, each of which have the

potential to generate low levels of groundborne vibration. Persons residing and working in close proximity to construction sites could be exposed to groundborne vibration or groundborne noise levels related to construction activities. The results from vibration can range from no perceptible effects at the lowest vibration levels to low rumbling sounds and perceptible vibrations at moderate levels to slight structural damage at the highest levels. Site-specific ground vibrations from construction activities very rarely reach levels that can damage structures, but they can often be perceived in the audible range and be felt in buildings very close to a construction site.

The construction and demolition that would occur as part of site-specific development permitted by the TOD Plans would involve the temporary and intermittent use of construction equipment, which can result in the generation of groundborne vibration levels. Groundborne vibration is a concern when sensitive receptors, such as residences, are in proximity to the vibration sources. Sensitive receptors in the TOD Plan areas could be adjacent to construction/demolition activities and be exposed to vibration.

The various PPV vibration velocities for several types of construction equipment, along with their corresponding RMS velocities (in VdB), that can generate perceptible vibration levels are identified in **Table 3.10-17**. As shown, vibration velocities could range from approximately 0.003 to 0.089 inch-per-second PPV at 25 feet from the source activity, depending on the type of construction equipment in use, which corresponds to RMS velocity levels of 58 to 87 VdB at 25 feet, respectively, from the source activity. For the purpose of this analysis, the vibration level for a large bulldozer provided in **Table 3.10-17** was used to evaluate vibration source levels at the nearest sensitive receptor from construction activity. In comparison to the Caltrans vibration criteria, vibration impacts from construction/demolition activities would exceed the criteria.

TABLE 3.10-17: VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT AT 25 FEET

Equipment	PPV (in/sec)	RMS (VdB)
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: FTA, 2006; Entech 2018

Since (1) individual development projects would be spread geographically throughout the TOD Plan areas and spread out over the TOD Plans' 20-year buildout period, and (2) construction events are short-term in nature, it is anticipated that an infrequent amount of vibration events would occur at sensitive land use receptors. However, depending on how close an actual receptor location is to a construction site and the type of building the receptor is (e.g., non-engineered timber and masonry building, historical building, etc.), the vibration levels at a

receptor location could exceed the vibration thresholds. As such, vibration impacts during construction associated with the proposed TOD Plans could be significant.

Significance Conclusion for Impact NOI-2

Vibration levels at site-specific construction sites within the TOD Plan areas could exceed applicable thresholds, and a significant impact would result. Implementation of mitigation measures would be required.

Mitigation Measures

Mitigation Measure NOI-2.1a: Use of large bulldozers, loaded trucks, and caisson drills on construction sites shall be prohibited within 45 feet of existing residential structures and 35 feet of institutional structures. Instead, small rubber-tired bulldozers shall be used within this area during demolition and/or grading operations to reduce vibration effects.

Implementation: Approvals of site-specific development projects are to be conditioned upon compliance with this mitigation measure.

Mitigation Measure NOI-2.1b: The operation of jackhammers shall be prohibited within 25 feet of existing residential structures and 20 feet of institutional structures.

Implementation: Approvals of site-specific development projects are to be conditioned upon compliance with this mitigation measure.

Mitigation Measure NOI-2.1c: Any site-specific development project within 50 feet of an historic building shall engage a qualified structural engineer to conduct a pre-construction assessment of the structural integrity of the nearby historic structure(s) and submit evidence that the operation of vibration-generating equipment associated with the new development would not result in structural damage to the adjacent historic building(s). If recommended by the pre-construction assessment, groundborne vibration monitoring of nearby historic structures shall be required.

Implementation. As part of the review of proposed construction permits for site-specific development projects

within 50 feet of an historic building, the City will review the project developer's contract specifications to ensure that a certified structural engineer is retained to conduct the required pre-construction assessment.

Conclusion with Implementation of Mitigation Measures

Construction of site-specific development projects permitted by the proposed TOD Plans would result in groundborne vibration levels that would exceed annoyance and potential damage thresholds during construction. **Mitigation Measures NOI-2.1a** and **NOI-2.1b** prohibit the use of construction equipment that generates high levels of vibration within specified distances from existing sensitive land uses and ensures that the construction-related vibration impacts would be reduced to a less than significant level. **Mitigation Measure NOI-2.1c** protects historic structures within the TOD Plan areas from construction of adjacent site-specific development. Impacts are therefore *significant but mitigable*.

Threshold NOI-2: Expose persons to or generate excessive groundborne vibration or groundborne noise levels.

Impact NOI-2.2: Proposed development within the TOD Plan areas does not include the types of uses that would involve activities or operation of stationary or mobile equipment that would result in high vibration levels in proximity to sensitive uses. Residential uses are, however, proposed adjacent to the Crenshaw/LAX Metro line and could be subject to vibration from rail operations. The Environmental Impact Statement/Environmental Impact Report prepared for the Crenshaw Transit Corridor Project concluded that no vibration impacts would occur along with Metro line within the City of Inglewood. *No impacts will result.*

Methodology

As noted above, the vibration criteria for structural damage and human annoyance established in the most recent Caltrans' *Transportation and Construction Vibration Guidance Manual* (2013) were used to determine significance of vibration impacts from construction. In relation to operations impacts, before conducting a specific analysis of vibration impacts, a determination was first made as to whether any sources of operational impact might be present that could affect sensitive uses.

Impact Analysis

The proposed land uses within the TOD Plan areas do not include uses that would not involve activities or operation of stationary or mobile equipment that would result in high vibration levels, which are more typical for large industrial projects that employ heavy machinery. During operations of new uses permitted by the TOD Plans, the primary source of vibration would likely be vehicle circulation within and adjacent to the TOD Plan areas. However, the FTA's *Transit Noise and Vibration Impact Assessment* states that it is unusual for vibration from vehicular sources (including buses and trucks) to be perceptible, even in locations close to major roads. As such, no sources of "excessive" groundborne vibration or noise levels are anticipated during operations.

Within the TOD Plan areas, passenger trains associated with the Crenshaw Metro Line will pass through the two planned Metro Stations within the TOD Plan areas on a daily basis. As described in the FTA's *Transit Noise and Vibration Impact Assessment* (FTA, 2006), locomotive-powered passenger trains traveling at 50 miles per hour (mph) can generate vibration levels up to approximately 84.5 VdB (0.067 in/sec PPV) at 50 feet from the track centerline. However, it should be noted that this vibration level represents the upper range of measurement data collected by FTA from well-maintained systems (FTA, 2006). The Environmental Impact Statement/Environmental Impact Report prepared for the Crenshaw Transit Corridor Project concluded that no vibration impacts would occur along with Metro line within the City of Inglewood.

Analysis Conclusion for Impact NOI-2.2

Proposed development within the TOD Plan areas does not include the types of uses that would involve activities or operation of stationary or mobile equipment that would result in high vibration levels in proximity to sensitive uses. Residential uses are, however, proposed adjacent to the Crenshaw/LAX Metro line and could be subject to vibration from rail operations. The Environmental Impact Statement/Environmental Impact Report prepared for the Crenshaw Transit Corridor Project concluded that no vibration impacts would occur along with Metro line within the City of Inglewood. No impacts will result.

Threshold NOI-3: Expose people to excessive airport-related noise within an airport land use plan or within two miles of a public airport of public use airport where such a plan has not been adopted.

Impact NOI-3: Site-specific development projects permitted by the proposed TOD Plans would expose people in the southern portion of the Westchester/Veterans TOD Plan area to airport-related noise levels from LAX above 65 dB CNEL. Because portions of the Westchester/Veterans TOD Plan area within the 65 dB CNEL

noise contour of LAX are designated residential, there is a potential for development of noise-sensitive residential uses. City noise standards consider such uses to be “Conditionally Acceptable” subject to mitigation. The 65 dB CNEL noise contour from Hawthorne Municipal airport does not extend into the Crenshaw/Imperial TOD Plan area. Mitigation Measure NOI-5 requires noise-sensitive development within the 65 dB CNEL of LAX to be designed and to provide noise insulation so as to meet City noise standards. Impacts would therefore be *significant but mitigable*.

Methodology

Airport-related noise impacts would be significant if sensitive land uses were subjected to aircraft noise in excess of 65 CNEL. To determine whether this threshold would be exceeded, the noise contours provided in the airport land use plan for Los Angeles International Airport were reviewed and compared to existing and proposed land uses in the Westchester/Veterans TOD Plan area.

In addition, since the 65 CNEL noise contour and airport influence area for Hawthorne Municipal Airport does not extend north of the I-105 freeway would not extend more than two miles beyond an airport for which an airport land use plan has not been prepared or more than two miles beyond a private airstrip, impacts for the TOD Plan areas would be less than significant, a further analysis of noise impacts would be unnecessary.

Impact Assessment

The southwestern boundary of the Westchester/Veterans TOD Plan area is approximately 0.6 miles northeast of the Los Angeles International Airport (LAX). As indicated in **Figure 3.10-6**, the southwestern portion of the Westchester/Veterans TOD Plan area lies within the 65 dB CNEL noise contours of LAX. The increased development intensities proposed by the TOD Plans development would not place additional dwelling units within the 65 dB CNEL noise contour.

The existing residential area within the Westchester/Veterans TOD Plan that is located east of the I-405 freeway, south of Kelso Street is within the 65 dB CNEL noise contour of LAX. As noted in Section 3.10.2, above, the Inglewood General Plan indicates that residential development is “Conditionally Acceptable” up to a 70 dB CNEL. According to the General Plan, “New construction or development should be undertaken only after detailed analysis of the noise reduction requirement is 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.”

Lands within the 65 and 70 dB CNEL contour lines are designated as residential within the Westchester/Veterans TOD Plan. While no new residential development is proposed within the 65 dB CNEL noise contour, replacement or existing residential structures with newer development could occur.

The Crenshaw/Imperial TOD Plan area is located across the I-105 freeway approximately 800 feet from the Hawthorne Municipal Airport. The 65 dB CNEL noise contour of Hawthorne Municipal Airport does not extend north of the I-105 freeway and does not, therefore affect the Crenshaw/Imperial TOD Plan area.

Significance Conclusion for Impact NOI-3

Site-specific development projects permitted by the proposed TOD Plans would expose people in the southern portion of the Westchester/Veterans TOD Plan areas to airport-related noise levels from LAX above 65 dB CNEL. The 65 dB CNEL noise contour from Hawthorne Municipal airport does not extend into the Crenshaw/Imperial TOD Plan area. A significant impact would therefore occur, requiring mitigation.

Mitigation Measures

Mitigation Measure NOI-3: Require site-specific development projects that include residential uses within the 65 CNEL noise contour of LAX to include appropriate locations for interior private areas and to implement noise reduction measures, such as double pane windows and insulation features to meet the City's interior noise standards of 45 dBA CNEL.

Implementation: Approvals of site-specific development projects are to be conditioned upon compliance with this mitigation measure.

3.10.6 REFERENCES - NOISE AND VIBRATION

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Westchester/Veterans and Crenshaw/Imperial Downtown Transit Oriented District (TOD) Traffic Impact Analysis Iteris. 2018

3.11 HAZARDS AND HAZARDOUS MATERIALS

3.11.1 INTRODUCTION

a. Overview

This section considers the nature and range of foreseeable hazardous materials and physical hazards/impacts that would result from site-specific development projects permitted by the proposed Westchester/Veterans and Crenshaw/Imperial Transit Oriented (TOD) Plans. It identifies the ways that hazardous materials and other types of hazards could expose people and the environment to various health and safety risks during construction activities and operation of proposed land uses within the two TOD Plan areas.

This section also describes routine hazardous materials that are likely to be used, handled, or processed within the TOD Plan areas, and the potential for upset and accident conditions in which hazardous materials could be released into the environment. The impact analysis identifies ways in which hazardous materials might be routinely used, stored, handled, processed, or transported, and evaluates the extent to which existing and future populations could be exposed to hazardous materials. The potential for air safety hazards resulting from the proximity of the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas to air traffic from the Los Angeles International Airport (LAX) is also evaluated in this section, along with an analysis of potential fire hazards and emergency response/access issues associated with proposed development within the TOD Plan areas

Air emissions can also carry hazardous materials and create potential risks to human health and the environment. Sources of hazardous or toxic air emissions include but are not limited to industrial processes, vehicle use (diesel particulate emissions from exhaust), and proximity to existing or relocated sources of diesel or other toxic air emissions. Impacts related to toxic air contaminants, including the release of diesel particulate matter, from construction truck trips and/or delivery truck trips (when the haul routes are located within 0.25-miles of an existing or proposed school) are identified in Section 3.7, *Air Quality*. Flooding is addressed in Section 3.12, *Hydrology and Water Quality*. Other safety hazards, such as earthquakes, are addressed in Section 3.13, *Geology, Soils, and Seismicity*.

b. Definitions

Constituent of Concern or **Contaminant of Concern** is a hazardous material that has the potential to cause damage to human health or the environment and create a “risk” to human health and the environment.

Exposure Pathway is the course a chemical or pollutant takes from the source to the organism exposed. A “complete” exposure pathway consists of four elements: chemical sources, migration routes (i.e., transport in the environment), an exposure point for contact (i.e., soil, air, or water), and exposure routes.

Exposure Route is the way a chemical or pollutant enters the organism after contact. Four exposure routes are recognized in risk evaluation methods: ingestion, inhalation, dermal (skin and eye), and injection.

Extremely Hazardous Substance, in the context of Public Resources Code Section 21151.4 pertaining to hazardous materials emissions near schools, refers to a material included on lists compiled pursuant to Section 25532 of the California Health and Safety Code, which incorporates regulated toxic and flammable substances under Section 112(r) of the federal Clean Air Act. Table 3 of Section 112(r) lists those regulated substances pursuant to Section 25532(g)(2) of the California Health and Safety Code.

Hazard includes any condition, practice, or procedure that is or may be dangerous, harmful, or perilous to employees, property, neighbors, or the general public.

Hazardous Material refers to any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or an administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment (California Health and Safety Code, Section 25501).

Hazardous Materials Release Site refers to any area, location, or facility where a hazardous material has been released or threatens to be released to the environment.

Hazardous Waste refers to any waste substance that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may either cause or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed (California Health and Safety Code, Section 25117).

Recognized Environmental Concerns are defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property (1) due to any release to the

environment, (2) under conditions indicative of a release to the environment, or (3) under conditions that pose a material threat of a future release to the environment.¹

Remedial Action or **Remediation** refers to actions required by federal, state, or local laws, ordinances, or regulations necessary to prevent, minimize, or mitigate damage that may result from the release or threatened release of a hazardous material. These actions include site cleanup; monitoring, testing, and analysis of site conditions; site operation and maintenance; and placing conditions or restrictions on the land use of a site upon completion of remedial actions.

Risk is determined by the probability of exposure to a hazardous material or a hazardous condition and the severity of harm such exposure would pose. Accordingly, the likelihood and means of exposure, in addition to the inherent toxicity of a material or damage that could be caused by a hazardous condition, are used to determine the degree of risk to human health or the environment.

3.11.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

Federal and state laws require that hazardous materials be specially managed and that excavated soils having concentrations of contaminants that are higher than specified acceptable levels be specially managed, treated, transported, and/or disposed of as a hazardous waste. Title 22 of the California Code of Regulations Sections 66261.20–24 contains technical descriptions of characteristics that would cause a soil, once excavated and discarded, to be designated a hazardous waste. California regulations are compliant with federal regulations and, in most cases, are more stringent. State and federal regulations also set standards for allowable concentrations of contaminants in order to protect the public health from harmful concentrations of hazardous materials.

Numerous federal, state, and local regulations have been enacted to prevent or mitigate damage to public health and safety and the environment from the release or threatened release of hazardous substances into the environment or workplace, to protect human health and environmental resources from existing site contamination, and to protect human health and safety in relation to airport operations. Thus, site-specific development and infrastructure projects permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plan are subject to a range of federal, state, regional, and local plans, policies, and regulations, which are described below.

¹ As per ASTM Standard Practice E 1527-13.

a. Federal Plans, Policies, and Regulations

The primary federal agencies responsible for hazardous materials management include the U.S. Environmental Protection Agency (USEPA) and the U.S. Department of Labor Occupational Safety and Health Administration (OSHA).

Resource Conservation and Recovery Act of 1976

Federal hazardous waste regulations are generally promulgated under the Resource Conservation and Recovery Act (RCRA). Pursuant to RCRA, USEPA regulates the generation, transportation, treatment, storage, and disposal of hazardous waste in a “cradle to grave” manner. RCRA was designed to protect human health and the environment, reduce or eliminate the generation of hazardous waste, and conserve energy and natural resources.

The Hazardous and Solid Waste Amendments of 1984 both expanded the scope of RCRA and increased the level of detail in many of its provisions, reaffirming the regulation from generation to disposal and prohibiting the use of certain techniques for hazardous waste disposal. USEPA has largely delegated responsibility for implementing the RCRA program to the State of California, which implements this program through the California Hazardous Waste Control Act.

RCRA regulates landfill siting, design, operation, and closure (including identifying liner and capping requirements) for licensed landfills. In California, RCRA landfill requirements are delegated to the California Department of Resources Recycling and Recovery (CalRecycle), which is discussed in detail below.

RCRA allows USEPA to oversee the closure and post-closure of landfills. Additionally, the federal Safe Drinking Water Act, 40 Code of Federal Regulations (CFR) Part 141, gives USEPA the power to establish water quality standards and beneficial uses for waters from below- or above-ground sources of contamination. For the Specific Plan area, water quality standards are administered by the Regional Water Quality Control Board (RWQCB).

RCRA also allows USEPA to control risk to human health at contaminated sites. Vapor intrusion presents a significant risk to human populations overlying contaminated soil and groundwater and is considered when conducting human health risk assessments and developing Remedial Action Objectives.

Comprehensive Environmental Response, Compensation, and Liability Act and the Superfund Amendments and Reauthorization Act of 1986

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as “Superfund,” established prohibitions and requirements concerning

closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. The Superfund Amendments and Reauthorization Act (SARA) amended CERCLA in 1986, stressing the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites, required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations, provided new enforcement authorities and settlement tools, increased state involvement in every phase of the Superfund program, increased the focus on human health problems posed by hazardous waste sites, encouraged greater citizen participation in making decisions on how sites should be cleaned up, and increased the size of the trust fund to \$8.5 billion. There are no Superfund sites within the Specific Plan area.

Emergency Planning and Community Right-to-Know Act of 1986

Through the Emergency Planning and Community Right-to-Know Act of 1986 (also known as Title III of Superfund), USEPA also imposes requirements that hazardous materials are properly handled in order to prevent or mitigate risk to human or environmental health in the event of an accidental release.

Occupational Safety and Health Act of 1970

Federal and state occupational health and safety regulations also contain provisions regarding hazardous waste management through the Occupational Safety and Health Act of 1970 (amended), which is implemented by OSHA. Code 29 of Federal Regulations (29 CFR) requires special training of handlers of hazardous materials; notification to employees who work in the vicinity of hazardous materials; acquisition from the manufacturer of material safety data sheets (MSDS), which describe the proper use of hazardous materials; and training of employees to remediate any hazardous material accidental releases. OSHA regulates administration of 29 CFR.

OSHA also establishes standards regarding safe exposure limits for chemicals to which construction workers may be exposed. Safety and Health Regulations for Construction (29 CFR 1926.65 Appendix C) contains requirements for construction activities, which include occupational health and environmental controls to protect worker health and safety. The guidelines describe the health and safety plan(s) that must be developed and implemented during construction, including associated training, protective equipment, evacuation plans, chains of command, and emergency response procedures.

Due to the existence of hazardous materials in the vicinity of the Specific Plan area, adherence to applicable hazard-specific OSHA standards would be required to maintain worker safety. For example, methane is regulated by OSHA under 29 CFR Part 1910.146 relative to worker

exposure to a “hazardous atmosphere” within confined spaces where the presence of flammable gas vapor or mist is in excess of 10 percent of the lower explosive limit. Title 49 of the CFR governs the manufacture of packaging and transport containers, packing and repacking, labeling, and the marking of hazardous material transport, and Title 42, Chapter 82 governs solid waste disposal and resource recovery.

Hazardous Materials Transportation Act

The transportation of hazardous materials is regulated by the Hazardous Materials Transportation Act (HMTA), which is administered by the Research and Special Programs Administration (RSPA) of the U.S. Department of Transportation (USDOT). The HMTA provides USDOT with a broad mandate to regulate the transport of hazardous materials, with the purpose of adequately protecting the nation against risk to life and property, which is inherent in the commercial transportation of hazardous materials. The HMTA governs the safe transportation of hazardous materials by all modes, excluding bulk transportation by water. The Research and Special Programs Administration carries out these responsibilities by prescribing regulations and managing a user-funded grant program for planning and training grants for states and Indian tribes. USDOT regulations that govern the transportation of hazardous materials are applicable to any person who transports, ships, causes to be transported or shipped, or is involved in any way with the manufacture or testing of hazardous materials packaging or containers. USDOT regulations pertaining to the actual movement govern every aspect of the movement, including packaging, handling, labeling, marking, placarding, operational standards, and highway routing. Additionally, USDOT is responsible for developing curricula to train for emergency response and administers grants to states and Indian tribes for ensuring the proper training of emergency responders. The HMTA was enacted in 1975 and was amended and reauthorized in 1990, 1994, and 2005.

b. State Plans, Policies, and Regulations

Hazardous Materials Management

In the regulation of hazardous waste management, California law often mirrors or is more stringent than federal law. The California Environmental Protection Agency (CalEPA) and California Occupational Safety and Health Administration (CalOSHA) are the primary state agencies responsible for hazardous materials management. Additionally, the California Emergency Management Agency (CalEMA) administers the California Accidental Release Prevention (CalARP) program. The California Department of Toxic Substances Control (DTSC), which is a branch of CalEPA, regulates the generation, transportation, treatment, storage, and disposal of hazardous waste, as well as the investigation and remediation of hazardous waste sites. The California DTSC program incorporates the provisions of both federal (RCRA) and state hazardous waste laws.

Hazardous Waste Control Act

The Hazardous Waste Control Act was passed in 1972 and established the California Hazardous Waste Control Program within the Department of Health Services. California's hazardous waste regulatory effort became the model for the federal RCRA. California's program, however, was broader and more comprehensive than the federal system, regulating wastes and activities not covered by the federal program. California's Hazardous Waste Control Act was followed by emergency regulations in 1973 that clarified and defined the hazardous waste program, as follows:

- The regulations included definitions of what was a waste and what was hazardous as well as what was necessary for appropriate handling, processing, and disposal of hazardous and extremely hazardous waste in a manner that would protect the public, livestock, and wildlife from hazards to health and safety.
- The early regulations also established a tracking system for the handling and transportation of hazardous waste from the point of waste generation to the point of ultimate disposition, as well as a system of fees to cover the costs of operating the hazardous waste management program.
- Advancing the newly developing awareness of hazardous waste management issues, the program established a technical reference center, for public and private use, dealing with all aspects of hazardous waste management.

California Government Code Section 65962.5 (a), Cortese List

The Hazardous Waste and Substance Sites (Cortese) List is a planning document used by the state, local agencies, and developers to comply with CEQA requirements for providing information about the location of hazardous materials release sites. Government Code Section 65962.5 requires CalEPA to develop an updated Cortese List at least annually. The DTSC is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

Hazardous Materials Business Plans

Article 1 of Chapter 6.95 of the California Health and Safety Code (Sections 25500–25520) requires that any business that handles, stores, or disposes of a hazardous substance at a given threshold quantity must prepare a hazardous materials business plan (HMBP). HMBPs are intended to minimize hazards to human health and the environment from fires, explosions, or an unplanned release of hazardous substances into air, soil, or surface water. The HMBP must be carried out immediately whenever a fire, explosion, or unplanned chemical release occurs.

An HMBP includes three sections: (1) an inventory of hazardous materials, including a site map that details their location; (2) an emergency response plan; and (3) an employee-training program. HMBPs serve as an aid to employers and employees in managing emergencies at a given facility. They also help better prepare emergency response personnel for handling a wide range of emergencies that might occur at the facility.

HMBPs are submitted to the Department of Environmental Health Hazardous Materials Division. The plans must be resubmitted, reviewed, revised, or amended as necessary every 3 years. The HMBP must also be amended within 30 days whenever there are changes in the amount or location of stored hazardous chemicals on a site. The Hazardous Materials Division conducts routine inspections at businesses required to submit business plans. The purpose of these inspections is to (1) ensure compliance with existing laws and regulations concerning HMBP requirements, (2) identify existing safety hazards that could cause or contribute to an accidental spill or release, and (3) suggest preventative measures designed to minimize the risk of a spill or release of hazardous materials. After initial submission of an HMBP, the business must review and recertify the HMBP every year.

Risk Management Plans

Article 2 of Chapter 6.95 of the California Health and Safety Code (Sections 25531–25543.3) requires the owner or operator of a stationary source (non-transportation) with more than a threshold quantity of a regulated substance to prepare a risk management plan. The state statutes and regulations—called the CalARP program—combine federal and state program requirements for the prevention of accidental releases of listed substances into the atmosphere. The CalARP program requires that a risk management plan include a hazard assessment program, an accidental release prevention program, and an emergency response plan. The risk management plan must be revised every 5 years or as necessary. Typical facilities or businesses that are required to prepare risk management plans include ammonia refrigeration facilities, water treatment and wastewater treatment plants that handle chlorine gas, and facilities that store flammable chemicals such as methane and propane.

Title 22 of California Code of Regulations and Hazardous Waste Control Law, Chapter 6.5

The DTSC regulates the generation, transportation, treatment, storage, and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Act. Both laws impose “cradle-to-grave” regulatory systems for handling hazardous waste in a manner that protects human health and the environment. CalEPA has delegated some of its authority under the Hazardous Waste Control Act to county health departments and other Certified Unified Program Agencies.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

In 1996, CalEPA adopted the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The Unified Program consolidates and coordinates the six state programs that regulate business and industry use, storage, handling, and disposal of hazardous materials and wastes. The County of Los Angeles Fire Department Health and Hazardous Materials Division provides the regulatory oversight for federal, state, and local laws and regulations related to hazardous materials use and disposal within the City of Inglewood. This County agency protects the public health and the environment from accidental releases and improper handling, storage, transportation, and disposal of hazardous materials and wastes through coordinated efforts of inspections, emergency response, enforcement, and site mitigation oversight. In addition, the County Fire Department Health and Hazardous Materials Division implements the following programs that are relevant to existing and the new uses that are proposed by the TOD Plans (County, 2016):

- Hazardous Materials Reporting and Response Planning (Hazardous Materials Disclosure)
- Uniform Fire Code Business Plan
- Hazardous Waste Generation and Onsite Treatment
- Accidental Release Prevention Program
- Above-Ground Storage Tank Regulations
- Underground Storage Tank Regulations

Title 23 of California Code of Regulations, Underground Storage Tank Act

The underground storage tank monitoring and response program is required under Chapter 6.7 of the California Health and Safety Code and Title 23 of the California Code of Regulations. The program was developed to ensure that facilities meet regulatory requirements for design, monitoring, maintenance, and emergency response in operating or owning underground storage tanks. Health departments are the local administering agencies for this program.

Title 27 of California Code of Regulations, Solid Waste

Title 27 of the California Code of Regulations contains a waste classification system that applies to solid wastes that cannot be discharged directly or indirectly to waters of the state and that therefore must be discharged to waste management sites for treatment, storage, or disposal. CalRecycle and its certified Local Enforcement Agency regulate the operation, inspection, permitting, and oversight of maintenance activities at active and closed solid waste management sites and operations.

California Human Health Screening Levels

The California Human Health Screening Levels (CHHSLs or “Chisels”) are concentrations of 54 hazardous chemicals in soil or soil gas that CalEPA considers to be below thresholds of concern for risks to human health. The CHHSLs were developed by the Office of Environmental Health Hazard Assessment on behalf of CalEPA. The CHHSLs were developed using standard exposure assumptions and chemical toxicity values published by USEPA and CalEPA. The CHHSLs can be used to screen sites for potential human health concerns where releases of hazardous chemicals to soils have occurred. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding CHHSL can be assumed to not pose a significant health risk to people who may live or work at the site. There are separate CHHSLs for residential and commercial/industrial sites.

Senate Bill 1889, Accidental Release Prevention Law/CalARP

Senate Bill (SB) 1889 required California to implement a new federally mandated program governing the accidental airborne release of chemicals promulgated under Section 112 of the Clean Air Act. Effective January 1, 1997, the CalARP program replaced the previous California Risk Management and Prevention Program and incorporated the mandatory federal requirements. The CalARP program addresses facilities that contain specified hazardous materials, known as “regulated substances,” which if involved in an accidental release could result in adverse off-site consequences. The CalARP program defines regulated substances as chemicals that pose a threat to public health and safety or the environment because they are highly toxic, flammable, or explosive.

Occupational Safety

Title 8 - CalOSHA

CalOSHA administers federal occupational safety requirements and additional state requirements in accordance with California Code of Regulations Title 8. CalOSHA requires preparation of an Injury and Illness Prevention Program (IIPP), which is an employee safety program of inspections, procedures to correct unsafe conditions, employee training, and occupational safety communication. This program is administered via inspections by the local CalOSHA enforcement unit.

CalOSHA regulates lead exposure during construction activities under California Code of Regulations Title 8, Section 1532.1, Lead, which establishes the rules and procedures for conducting demolition and construction activities such that worker exposure to lead contamination is minimized or avoided.

Compliance with CalOSHA regulations and associated programs would be required for the proposed Specific Plan due to the potential hazards posed by on-site construction activities and contamination from former uses.

Emergency Response to Hazardous Materials Incidents

The State of California has developed an emergency response plan to coordinate emergency services provided by federal, state, and local governments and private agencies. The plan is administered by CalEMA and includes response to hazardous materials incidents. CalEMA coordinates the response of other agencies, including CalEPA, California Highway Patrol, California Department of Fish and Wildlife, Regional Water Quality Control Board Santa Ana Region, South Coast Air Quality Management District, County of Los Angeles Fire Department, and the Los Angeles County Health Department.

California Emergency Services Act

The California Emergency Services Act was adopted to establish the state's roles and responsibilities during human-made or natural emergencies that result in conditions of disaster and/or extreme peril to life, property, or the resources of the state. This Act is intended to protect health and safety by preserving the lives and property of the people of the state.

California Natural Disaster Assistance Act

The California Natural Disaster Assistance Act provides financial aid to local agencies to assist in the permanent restoration of public real property, other than facilities used solely for recreational purposes, when such real property has been damaged or destroyed by a natural disaster. The California Natural Disaster Assistance Act is activated after the following occurs: (1) a local declaration of emergency is issued, or (2) CalEMA gives concurrence with the local declaration, or the governor issues a proclamation of a state emergency. Once the Act is activated, local government is eligible for certain types of assistance, depending upon the specific declaration or proclamation issued.

State Fire Regulations

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The state fire marshal enforces these regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California.

California Fire Code (Chapter 33, Fire Safety During Construction and Demolition)

California Fire Code Chapter 33 related to fire safety during construction and demolition prescribes safeguards to provide reasonable safety to life and property from fire during such operations. Specific safeguards relate to oil-fired heaters, gas heaters, refueling, smoking, waste disposal, welding, electrical, flammable, and combustible odors, water supply for fire protection, and fire extinguishers. Implementation of these safeguards is designed to reduce the potential for fire-related hazards during construction and demolition activities.

c. Regional Plans, Policies, and Regulations**South Coast Air Quality Management District Rule 1166**

Rule 1166 sets requirements to control the emission of volatile organic compounds (VOC) from excavating, grading, handling, and treating soil containing VOCs due to leakage from storage or transfer operations, accidental spillage, or other deposition. This rule requires development and approval of a mitigation plan, monitoring of VOC concentrations, and implementation of the mitigation plan if VOC-contaminated soil is detected. Worker safety and health are also regulated by the federal Occupational Safety and Health Act of 1970 and CalOSHA. Exposure limits define the maximum amount of hazardous airborne chemicals to which an employee may be exposed over specific periods. When administrative or engineering controls cannot achieve compliance with exposure limits, protective equipment or other protective measures must be used. Employers are also required to provide a written health and safety program, worker training, emergency response training, and medical surveillance.

Los Angeles County Airport Land Use Plan

State Law requires the creation of Airport Land Use Commissions (ALUCs) within counties to coordinate planning for the areas surrounding public use airports. In Los Angeles County, the Regional Planning Commission has the responsibility for acting as the Airport Land Use Commission and for development of Airport Land Use Plans (ALUPs). The purpose of the ALUPs is to protect the public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to noise and safety hazards. In addition, the ALUC utilizes ALUPs to review proposed developments within the ALUC planning boundaries. The planning boundary of the ALUP is called the "airport influence area," which includes the extent of potential noise and safety impacts associated with airports (CALUP 2011). As previously indicated **Figure 3.10-6**, the southwestern portion of the Westchester/Veterans TOD Plan area lies within the 65 dB and 70 dB CNEL noise contours of LAX. The airport influence area of Hawthorne Municipal Airport does not extend north of the I-105 freeway into the Crenshaw/Imperial TOD Plan area.

a. Local Plans, Policies, and Regulations

City of Inglewood Hazard Mitigation Plan

The City of Inglewood Multi-Hazard Mitigation Plan was developed by the City to reduce or eliminate long-term risk to human life and property from the hazards identified in **Table 3.11-1**. In addition, the City prepared an Emergency Response Plan to comply with the California Standardized Emergency Management System and the Federal Emergency Management Agency (FEMA) National Incident Management System. The plan includes information on the Emergency Operations Organization, the roles and responsibilities of each City division, and includes operational checklists to guide response actions.

City of Inglewood Municipal Code

Chapter 6, Article 1 of the Inglewood Municipal Code adopts the Los Angeles County Fire Code as the Fire Code of the City of Inglewood. Additionally, Article 2, Sections 6-5 of the Inglewood Municipal Code designates the Los Angeles County Fire Department as the administering agency for the hazardous material inventory and emergency response program within the City of Inglewood, including the provisions of the California Hazardous Materials Release Response Plans and Inventory Law and other hazardous materials related regulations. These sections of the Municipal Code set forth requirements to ensure fire safety of new and reconstructed buildings within Inglewood.

TABLE 3.11-1: HAZARDS ADDRESSED IN THE INGLEWOOD MULTI-HAZARD MITIGATION PLAN

Hazard	Historic Occurrence	Mitigation Potential	Likelihood of Occurrence		
			Low	Medium	High
Airplane crash	Yes	No		√	
Civil unrest	Yes	No		√	
Dam failure	No	Yes	√		
Earthquake	Yes	Yes			√
Flood/Winter Storm	No	Yes	√		
Hazmat Release	No	Yes			√
Human Threat Events/Terrorism	No	Yes			√
Hurricane wind/Storm surge	No	Yes	√		
Nuclear Incident	No	Yes	√		
Tornado	No	Yes	√		
Train Derailment	No	No		√	
Tsunami	No	Yes	√		
Wildfire	No	Yes	√		

Source: Inglewood Multi-Hazard Mitigation Plan

3.11.3 ENVIRONMENTAL SETTING

a. Hazardous Materials

The TOD Plan areas are developed, urban in character, and include a variety of land uses, such as: residential, commercial retail, offices, industrial manufacturing, and public uses. Hazardous materials are routinely used, stored, and transported in most commercial/retail and office-based businesses, industrial facilities, medical facilities, and households. The Los Angeles County Fire Department Health Hazardous Materials Division maintains a list of registered hazardous waste transporters and the types of wastes that are authorized to be transported. However, the general use, storage, and disposal of potentially hazardous materials that currently occur in the TOD Plan areas are typical of those commonly found in urban areas, and generally include cleaning and metal solvents, pesticides/herbicides, paints, fuels, oils, and lubricants.

Also, in urbanized, mixed-use areas, such as the TOD Plan areas, risks from hazards and hazardous materials are associated with historical land uses involving the use of hazardous materials for building construction (lead and asbestos) or for operation for uses such as auto repair shops, medical offices, dry cleaners, and photo processing centers. Many of the existing buildings in the TOD Plan areas were constructed from the 1920s through the 1980s. Based on their age, these older buildings may contain asbestos, lead-based paints (LBPs) and potentially toxic finishes, molds, and/or polychlorinated biphenyls (PCBs) that could be released during demolition or renovation activities. Typical hazardous materials of concern for existing older structures include:

- **Asbestos** is a mineral fiber that is carcinogenic and harmful to respiratory health and is considered both a hazardous air pollutant and a human health hazard. Because of its fiber strength and heat resistance, it was widely used prior to the 1980s in California in a variety of building construction materials for insulation, fire-retardation, and friction and heat-resistant products, such as ducting insulation, wallboard, shingles, ceiling tiles, floor tiles, insulation, plaster, and floor backing. Thus, buildings constructed prior to 1980 could contain asbestos-containing materials. The risk to human health is from inhalation of airborne asbestos, which commonly occurs when asbestos-containing materials are disturbed during activities such as demolition and renovation. Due to the age of the buildings within the TOD Plan areas, it is likely that asbestos-containing materials are present.
- **Lead** is a recognized harmful environmental pollutant exposed through air, drinking water, food, soils, paint, and dust. Lead was widely used in paint, gasoline, water pipes, and many other products prior to 1977 when the U.S. Consumer Product Safety Commission banned the use of lead-based paint. Common methods of paint removal, such as sanding, scraping, and burning, create dust and the potential for lead to be

absorbed into the body and pose a potential health risk. Since many of the structures located within the TOD Plan area were built prior to the federal regulations banning the use of lead-based paints (1977), it is likely to exist in structures constructed prior to 1977.

- **Polychlorinated Biphenyls (PCBs)** are synthetic chemicals that were manufactured for use in various industrial and commercial applications -- including oil in electrical and hydraulic equipment, and plasticizers in paints, plastics, and rubber products -- because of their non-flammability, chemical stability, high boiling point, and electrical insulation properties. When released into the environment, PCBs persist for many years, accumulate, and concentrate in organisms. The USEPA has classified PCBs as probable human carcinogens. In 1979, the USEPA banned the use of PCBs in new electrical equipment and began a program to phase out PCB-containing equipment. Thus, older industrial areas within the TOD Plan areas could contain PCBs.

Additionally, soils and groundwater may be contaminated due to historical spills and leaking underground storage tanks. There are several known Leaking Underground Storage Tanks (LUSTs) in the TOD Plan areas identified by the State Water Resources Control Board GeoTracker, which are identified in **Table 3.11-2**.

Per the California Department of Toxic Substances Control (DTSC) EnviroStor database there are in addition, to the sites identified in Table 3.22-2, above, the following contaminated state agency monitored properties (EnviroStor, 2018):

- Rho-Chem, LLC, 425 Isis Avenue: Operating Permit for a hazardous waste site pursuant to RCRA
- Tyco Electronics Printed Circuit Group, 339 Isis Avenue: Protective Filer for a hazardous waste site
- Charles Caine Company, 8325 Hindry Avenue: Remedial Action for cleanup of former spray paint facility

b. Transport of Hazardous Materials

The transport of hazardous materials through the City is regulated by the California Department of Transportation (Caltrans) and California Highway Patrol (CHP). As a regional freeway transportation corridor, Interstate 405 (I-405) provides regional or sub-regional routes to Inglewood and may be routinely used for transport of hazardous materials. Truck routes (Florence Avenue, La Cienega, Century Boulevard) traverse the City where hazardous materials may also be routinely transported. In addition, within the TOD Plan areas there are large arterial streets where hazardous materials could be routinely transported, such as Manchester Boulevard, Florence Avenue, and La Brea Avenue.

TABLE 3.11-2: LEAKING UNDERGROUND STORAGE TANKS WITHIN THE TOD PLAN AREAS

Location	Description	Cleanup Status
Westchester/Veterans TOD Plan Area		
Princeland Property 1237 Arbor Vitae Street	Cleanup Program Site	Open Site Assessment
Tosco – 76 Station 8600 South Aviation Boulevard	LUST Cleanup Site	Completed Case Closed
Your Man Tour 8831 South Aviation Boulevard	LUST Cleanup Site	Completed Case Closed
Aviation Inglewood (formerly Bodycote) 9007-9121 South Aviation Boulevard	LUST Cleanup Site	Completed Case Closed
Former Collins Trust Property 9117-9121 South Aviation Boulevard	LUST Cleanup Sites (2)	Completed Case Closed
Alamo 9020 South Aviation Boulevard	LUST Cleanup Site	Completed Case Closed
Freight Forwarders 9107 South Aviation Boulevard	Cleanup Program Site	Completed Case Closed
Harry's Airport Garage 9131 South Aviation Boulevard	LUST Cleanup Site	Completed Case Closed
Family of Faith Church 400 West Florence Avenue	LUST Cleanup Site	Completed Case Closed
LAX Equipment 830 West Florence Avenue	LUST Cleanup Site	Completed Case Closed
Glasgow Property 315 South Glasgow Avenue	Cleanup Program Site	Open Site Assessment
Barnes Wholesale Inc. 740 South Glasgow Avenue	LUST Cleanup Site	Completed Case Closed
Avaya Property 400 South Hindry Avenue	Cleanup Program Site	Open Site Assessment
JDJ Richmond LP 929 West Hyde Park Boulevard	Cleanup Program Site	Open Inactive
JDJ Richmond LP 929 West Hyde Park Boulevard	LUST Cleanup Site	Completed Case Closed
Mobile #18 – Len 8307 South La Cienaga Boulevard	Cleanup Program Site	Open Remediation
7-11 #24142 345 West Manchester Boulevard	LUST Cleanup Site	Completed Case Closed
Exxon #7-4181 633 West Manchester Boulevard	LUST Cleanup Site	Completed Case Closed
Tire World (formerly ARCO) 920 West Manchester Boulevard	LUST Cleanup Site	Open Inactive

Location	Description	Cleanup Status
Prince Chrysler 1030 West Manchester Boulevard	Cleanup Program Site LUST Cleanup Site	Completed Cases Closed
Rover ARCO 1110 West Manchester Boulevard	LUST Cleanup Site	Completed Case Closed
Shell Station 1135 West Manchester Boulevard	LUST Cleanup Site	Completed Case Closed
Transit Mixed Concrete Company 505 Railroad Place	LUST Cleanup Site	Completed Case Closed
Crenshaw/Imperial TOD Plan Area		
Chevron #9-8503 11400 Crenshaw Boulevard	LUST Cleanup Site	Completed Case Closed
Crenshaw Business Complex 12501-12629 Crenshaw Boulevard	Cleanup Program Site	Completed Case Closed
Conoco Phillips/Unocal 3101 West Imperial Highway	LUST Cleanup Site (2)	Completed Cases Closed

c. Existing Schools with and near the TOD Plan Areas

The public schools in and nearby the TOD Plan areas include:

- Oak Street Elementary (K-5), 633 South Oak Street within 0.25 miles of the Westchester/Veterans TOD Plan area
- Bennet-Kew Elementary (K-5), 11710 South Cherry Avenue within the Crenshaw-Imperial TOD Plan area

d. Emergency Response

The City of Inglewood has adopted a Multi-Hazard Mitigation Plan that was developed to reduce or eliminate long-term risks to human life and property from a variety of potential hazards. The City also has an Emergency Response Plan to comply with the California Standardized Emergency Management System and the Federal Emergency Management Agency (FEMA) National Incident Management System. The plan sets forth the City's planned response to emergency situations including earthquake, fire, major rail and roadway accident, hazardous materials incident, civil disturbances, nuclear, and terrorist activities.

The Emergency Response Plan designates evacuation routes in the event of a large-scale hazard event, which includes Florence Avenue and La Brea Avenue, which traverse the TOD Plan areas; in addition to Crenshaw Boulevard, Imperial Highway, La Cienega Boulevard, I-405, and I-105 that traverse or are adjacent to other areas of the City of Inglewood.

3.11.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of hazards and hazardous materials impacts. Appendix G of the CEQA Guidelines indicates that a project would have a significant effect if it were to:

- Threshold HAZ-1** Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials;
- Threshold HAZ-2** Create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment;
- 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;
- Threshold HAZ-4** Be located on a site that 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;
- Threshold HAZ-5** Result in a safety hazard or excessive noise for people residing or working within an airport land use plan or, where such plan has not been adopted, within 2 miles of a public airport;
- Threshold HAZ-6** Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; or
- Threshold HAZ-7** Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

3.11.5 IMPACTS AND MITIGATION MEASURES

Threshold HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials.

Impact HAZ-1: Because site demolition and construction activities, as well as operation of proposed new uses permitted by the Westchester-Veterans and Crenshaw-Imperial TOD Plans, would be required to comply with applicable regulations for the handling, use, transportation, and disposal of hazardous materials, neither significant health risks to the public nor environmental hazards

would be created. Impacts related to the routine transport, use, or disposal of hazardous materials would therefore be *less than significant*.

Methodology

Analysis in this impact discussion is focused on the day-to-day (routine) use, disposal, transport, or management of hazardous or potentially hazardous materials that would occur as the result of the site-specific development and infrastructure projects permitted by the proposed TOD Plans. The severity of potential hazards to people, property, and the environment associated with the day-to-day use, transport, and/or disposal of hazardous materials by new development permitted by the TOD Plans is analyzed. Additionally, this section addresses short-term impacts resulting from demolition of existing (usually older) structures and facilities associated with the type of uses proposed and the materials that operation of these proposed new uses would entail.

In determining the level of significance, the analysis recognizes that all development permitted by the proposed TOD Plans would be required to comply with relevant federal, state, and local laws and regulations that are designed to ensure the safety of routine transport, use, or disposal of hazardous materials.

A significant impact would result if activities permitted by the TOD Plans would not comply with applicable federal, state, and local regulations, or would otherwise expose people to health risks or create an environmental hazard due to the day-to-day use, disposal, transport, or management of hazardous or potentially hazardous materials.

Impact Assessment

Demolition and Construction

Use and Generation of Hazardous Materials

Construction activities would include demolition of some existing buildings and parking lots. Due to the age of the existing structures within the TOD Plan areas, it is possible that either asbestos-containing materials or lead-based paint could be present within structures to be demolished. The asphalt and concrete from demolition of parking areas has the potential to cause dust, but not the release of hazardous materials.

Construction of site-specific development projects permitted by the TOD Plans would use hazardous materials in the form of paints, solvents, glues, roofing materials, and other common construction materials containing potentially toxic substances. In addition, hazardous materials would be needed for fueling and servicing construction equipment on construction sites. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of

these materials is regulated by County of Los Angeles Fire Department Health and Hazardous Materials Division, which provides regulatory oversight for federal, state, and local laws and regulations related to hazardous materials use and disposal within the City of Inglewood.

Because site-specific construction projects will be required to comply with all applicable legal requirements for the use of hazardous material, impacts related to construction activities would be less than significant.

Transport and Disposal of Hazardous Materials

The proposed TOD Plans propose infill development within an existing urban area, including redevelopment of older, potentially contaminated sites. During construction of future site-specific development projects permitted by the TOD Plans, hazardous materials in the form of paints, solvents, glues, roofing materials, and other common construction materials containing toxic substances would be transported to individual construction sites.

In addition, asbestos, lead, PCBs, or other hazardous materials could exist within buildings that would be demolished or remodeled as part of site-specific development and infrastructure projects permitted by the proposed TOD Plans. Thus, it is possible that one or more of these hazardous materials could be transported from the TOD Plan areas for proper disposal.

Hazardous material surveys and abatement activities for buildings constructed prior to the 1980s would be required pursuant to the existing USDOT, DTSC, Title 27 of the California Code of Regulations, CalEPA, Cal/OSHA regulations, and Section 19827.5 of the California Health and Safety Code. In addition, all PCBs, asbestos-containing materials, and lead based paints are required to be abated in accordance with SCAQMD, Cal/OSHA, and California Health and Safety Code requirements prior to demolition or renovation activities commence.

The asbestos, lead, PCBs, or other hazardous materials that may be encountered during demolition or construction activities would be transported and disposed of in compliance with all applicable regulations for the handling of such waste, including SCAQMD Rule 1403 (asbestos) and the California Code of Regulations. Additionally, appropriate documentation for hazardous waste that is transported in connection with activities at development sites (such as disposal of asbestos or building materials containing lead-based paint or PCBs) would be required by the City's Public Works Department prior to issuance of any demolition or construction permits (as required by federal, state, and city regulations) to ensure compliance with the existing hazardous materials regulations described above. These requirements were developed to protect human health and the environment and compliance with these existing regulations would reduce impacts related to demolition, transport, and disposal of hazardous materials to a less-than-significant level.

Operations

Use and Generation of Hazardous Materials

The proposed TOD Plans would allow a complementary mix of land uses that would be consistent with an urban mixed-use neighborhood that includes residential, restaurant, retail, office, hotel, civic, and light industrial uses. These land uses would routinely use limited quantities of potentially hazardous materials consisting of typical household and maintenance products (e.g., paints, fuels, lubricants, cleaning solvents, adhesives, sealers, pesticides/herbicides) that are common in urban areas and already occur in the TOD Plan areas.

Compared to the current uses and levels of hazardous material generation within the TOD Plan areas, future uses permitted by the TOD Plans would not substantially increase the amount of hazardous materials and/or waste being used or generated, and the TOD Plans would not create new significant hazardous conditions or exacerbate existing hazardous conditions.

Additionally, individual businesses that use or store hazardous materials are subject to federal and state regulations regarding hazardous material use, storage, transportation, and disposal. The Los Angeles County Fire Department Health and Hazardous Materials Division provides regulatory oversight for federal, state, and local laws and regulations related to hazardous materials use and disposal within the City of Inglewood. Businesses handling or storing certain amounts of hazardous materials are required by the Fire Department to prepare a Hazardous Materials Business Plan and Risk Management Plan (per California Health and Safety Code Sections 25500–25543) that includes an inventory of hazardous materials stored on site, an emergency response plan, and procedures to be used in the event of a release of a hazardous material. As a result, site-specific development and infrastructure projects permitted by the proposed TOD Plans would not result in a substantial increase in the use, generation, or risks related to the use and generation of hazardous materials.

Transport and Disposal of Hazardous Materials

The transport of potentially hazardous materials would continue to occur on streets in and adjacent to the TOD Plan areas, such as Florence Avenue, Manchester Boulevard, Crenshaw Boulevard, and Imperial Highway, as well as on the regional freeway system. The proposed TOD Plans provide for an increase in commercial uses such as office and retail and could include establishments such as dry cleaners and gas stations; however, these types of uses do not typically involve the transport of high volumes of hazardous materials. Therefore, compared to the current uses and levels of hazardous material generation, it is unlikely that future uses permitted by the TOD Plans would substantially increase the amount of hazardous materials and/or waste transported, or generated in, the TOD Plan areas. In addition, I-405, I-105, and Imperial Highway are used for the transport of hazardous material generated from various areas in and outside of Los Angeles County. Because all site-specific development and

infrastructure projects permitted by the proposed TOD Plans would be required to comply with relevant federal and state laws and regulations for transportation of potentially hazardous materials that are designed to ensure the safety of routine transport of hazardous materials, site-specific development and infrastructure projects permitted by the TOD Plans would not result in a substantial effect on the current use of the I-405, I-105, Imperial Highway, or any other roadway for transport of hazardous materials.

The transport of hazardous materials is subject to applicable federal and state regulations to reduce the risk of accidental spills, leaks, fire, or other hazardous conditions. Appropriate documentation for hazardous materials that are transported in connection with individual project site activities would be required for compliance with the existing hazardous materials regulations described above. The U.S. Department of Transportation Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials (Code of Federal Regulations Titles 40, 42, 45, and 49 and implemented by California Code of Regulations Titles 17, 19, 22, and 27), and compliance with applicable regulations as well as oversight by the appropriate federal, state, and local agencies would minimize the risk of hazardous materials exposure during transport.

Significance Conclusion for Impact HAZ-1

Because site demolition and construction activities, as well as operation of proposed new uses permitted by the Westchester-Veterans and Crenshaw-Imperial TOD Plans, would be required to comply with applicable regulations for the handling, use, transportation, and disposal of hazardous materials, neither significant health risks to the public nor environmental hazards would be created. Impacts related to the routine transport, use, or disposal of hazardous materials would therefore be less than significant, and no mitigation measures would be required.

Threshold HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.

Impact HAZ-2: The types of residential, retail, and office uses permitted by the TOD Plans are associated with use and storage of common household products with low levels of risk for upset or accidents that would release hazardous materials into the environment. In addition, the TOD Plans would convert approximately 253,639 square feet of existing industrial use to residential, retail, and office uses. Demolition, grading, and construction activities for site-specific development projects, as well as ongoing operations

of uses permitted by the TOD Plans would be required to comply with existing laws and regulations for the transport, use, handling, and disposal of hazardous materials. Such compliance would minimize the potential for upset and accidental releases of hazardous materials. As a result, the impact would be *less than significant*.

Methodology

Analysis in this impact discussion is focused on the potential of a reasonably foreseeable upset or accident condition involving release of hazardous materials into the environment from construction of site-specific development and infrastructure projects permitted by the proposed TOD Plans. This section addresses short-term construction impacts resulting from demolition of existing (usually older) structures, as well as from disturbance of any contaminated soils that may be encountered. In addition, the potential for risk of upset and the severity of consequences to people or property associated with the potential release of hazardous materials into the environment from operation of the proposed land uses that would be permitted by the TOD Plans is analyzed.

In determining the level of significance, the analysis recognizes that all site-specific development and infrastructure projects permitted by the proposed TOD Plans would be required to comply with relevant federal, state, and local laws and regulations that are designed to minimize the potential for upset or accident conditions, and to protect public health and safety from foreseeable upset or accident conditions involving release of hazardous materials into the environment.

A significant impact would result if the site-specific development permitted by the TOD Plans would include uses involving large amounts of hazardous materials or uses associated with the potential for foreseeable upset or accident conditions involving release of hazardous materials into the environment. A significant impact would result if the site-specific development permitted by the TOD Plans would not comply with applicable federal, state, and local regulations, and thereby expose people to health risks or create an environmental hazard due to a reasonably foreseeable upset or accident condition involving release of hazardous materials into the environment.

Impact Assessment

Construction

While the routine use, storage, transport, and disposal of hazardous materials in accordance with applicable regulations during demolition, excavation, grading, and construction activities

as discussed in Impact HAZ-1, above, would not pose health risks or result in significant impacts, improper use, storage, transportation and disposal of hazardous materials and wastes could result in accidental spills or releases, posing health risks to workers, the public, and the environment. Thus, the potential exists for the proposed TOD Plans to result in the accidental release of hazardous materials. Construction workers and the public could be exposed to lead and asbestos that are present within structures undergoing demolition. Additionally, exposure to unanticipated hazardous substances could occur from currently unknown soil contamination that may be present from existing or past uses.

Buildings within the TOD Plan areas date back to the 1920s through the 1980s, a period when many structures were constructed with what are now recognized as hazardous building materials, such as lead and asbestos. Demolition or redevelopment of these older structures could result in the release of hazardous materials. However, asbestos abatement contractors must follow state regulations contained in California Code of Regulations Sections 1529, and 341.6 through 341.14 to ensure that asbestos removed during demolition or redevelopment of an existing building is transported and disposed of at an appropriate facility, such that risk of upset or accident conditions involving release of asbestos containing materials into the environment would be reduced to a less than significant level. The contractor and hauler of the material are required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. Section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos.

Additionally, lead based materials may have been used within existing structures in the TOD Plan areas. Lead exposure guidelines provided by the U.S. Department of Housing and Urban Development provide regulations related to the handling and disposal of lead-based products. Federal regulations to manage and control exposure to lead-based paint are described in Code of Federal Regulations Title 29, Section 1926.62 and state regulations related to lead are provided in the California Code of Regulations Title 8 Section 1532.1. These regulations cover the demolition, removal, cleanup, transportation, storage, and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring and compliance to ensure the safety of construction workers exposed to lead-based materials. Cal/OSHA's Lead in Construction Standard requires project proponents to develop and implement a lead compliance plan when lead-based paint would be disturbed during construction or demolition activities. The plan must describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. In addition, Cal/OSHA requires 24-hour notification if more than 100 square feet of lead-based paint would be disturbed. Adherence to

the existing regulations would reduce potential hazards impacts related to lead and asbestos to a less than significant level.

Grading and excavation of sites during construction of site-specific development projects permitted by the proposed TOD Plans may expose construction workers and the public to potentially unknown hazardous substances present in the soil. If any unidentified sources of contamination are encountered during grading or excavation, the handling and removal activities required could pose health and safety risks to workers and the public. Soil, water, or air contamination could cause various short-term or long-term adverse health effects in persons exposed to the hazardous substances.

Due to the long history of urban uses within the TOD Plan areas, it is also possible that old underground storage tanks (USTs) that were in use prior to permitting and record keeping requirements may be present. If an unidentified UST were to be uncovered or disturbed during construction activities, it could pose both health and safety risks, such as the exposure of workers, tank handling personnel, and the public to tank contents or vapors. Potential risks, if any, posed by USTs would be minimized by managing any uncovered tank pursuant to existing Los Angeles County standards as enforced and monitored by the County Department of Public Health/Environmental Health Division and DTSC, which would reduce potential hazards impacts related to unknown contamination or USTs to a less-than-significant level.

The extent to which groundwater may be affected, is limited. As described in Section 3.14, *Geology, Soils, and Seismicity*, groundwater depths in the TOD Plan areas range from 40 to beyond 100 feet below the ground level. Thus, the depth to groundwater limits the potential of groundwater contamination. However, should groundwater contamination be identified, remediation activities would be required by the Los Angeles Regional Water Quality Control Board (LARWQCB) prior to the commencement of any new construction activities, which would reduce potential hazards impacts related to groundwater contamination to a less than significant level.

Overall, should construction activities be proposed for a site that may be contaminated due to previous uses, a site study and specific remediation and cleanup activities, would be required, if necessary, by the existing federal and state regulations, under the supervision of the DTSC before construction activities could begin. Construction activities for site-specific development and infrastructure projects permitted by the proposed TOD Plans would be undertaken in compliance with existing agency regulations related to hazardous materials. As a result, potential impacts related to the reasonably foreseeable upset or accident conditions involving release of hazardous materials into the environment would be less than significant.

While the routine use, storage, transport, and disposal of hazardous materials in accordance with applicable regulations during demolition, grading, and construction activities as discussed

in Impact HAZ-1, above, would not pose health risks or result in significant impacts, improper use, storage, transportation, or disposal of hazardous materials and wastes could result in accidental spills or releases, posing health risks to workers, the public, and the environment. Thus, construction of site-specific development and infrastructure projects permitted by the proposed TOD Plans could result in the accidental release of hazardous materials. Additionally, exposure to unanticipated hazardous substances could occur from currently unknown soil contamination that may be present.

The use of best management practices (BMPs) during construction, implemented as part of a SWPPP as required by the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, would minimize potential adverse effects on the general public and the environment. Construction contract specifications would include strict on-site handling rules to keep construction and maintenance materials out of groundwater and soils. BMPs include but are not limited to:

- Establishing a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Following manufacturers' recommendations on the use, storage, and disposal of chemical products used in construction;
- Avoiding overtopping construction equipment fuel tanks;
- Properly containing and removing grease and oils during routine maintenance of equipment; and
- Properly disposing of discarded containers of fuels and other chemicals.

Operations

In general, risks from hazards and hazardous materials would be adequately addressed through compliance with existing federal, state, and local regulations. Development permitted by the proposed TOD Plans would involve a variety of land uses and would include the use of and storage of common hazardous materials such as paints, solvents, and cleaning products within residential, retail, and office settings. The TOD Plans would result in a net reduction of 253,639 square feet of industrial uses within the Plan areas.

Additionally, building mechanical systems and grounds and landscape maintenance could also use a variety of products formulated with hazardous materials, including fuels, cleaners, lubricants, adhesives, sealers, and pesticides/herbicides. The environmental and health effects of different chemicals are unique to each chemical and depend on the extent to which an individual is exposed. The extent and exposure of individuals to hazardous materials would be limited by the relatively small quantities of these materials that would be stored and used on individual project sites throughout the TOD Plan areas. Any business or facility which uses,

generates, processes, produces, packages, treats, stores, emits, discharges, or disposes a hazardous material (or waste) is a handler and would require a hazardous materials handler permit and would be required to provide regular reporting to the California Environmental Reporting System (CERS).

Through future development permitted by the proposed TOD Plans, hazardous materials could be stored within the TOD Plan areas; however, such materials would generally be in the form of routinely used, common chemicals. All hazardous materials would be required to be used and stored in accordance with applicable regulations and such uses would be required to comply with federal and state laws to reduce the potential consequences of hazardous materials accidents. As a result, site-specific development and infrastructure projects permitted by the proposed TOD Plans would not result in a substantial hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Significance Conclusion for Impact HAZ-2

The types of residential, retail, and office uses permitted by the TOD Plans are associated with use and storage of common household products with low levels of risk for upset or accidents that would release hazardous materials into the environment. In addition, the TOD Plans would convert approximately 253,639 square feet of existing industrial use to residential, retail, and office uses. Demolition, grading, and construction activities for site-specific development projects, as well as ongoing operations of uses permitted by the TOD Plans would be required to comply with existing laws and regulations for the transport, use, handling, and disposal of hazardous materials. Such compliance would minimize the potential for upset and accidental releases of hazardous materials. As a result, the impact would be less than significant, and no mitigation measures would be required.

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.

Impact HAZ-3: The proposed TOD Plans could permit businesses with the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Compliance with existing laws and regulations would minimize the risks associated with the exposure of sensitive receptors, including schools, to hazardous materials due to routine activities or upset/accident conditions. Therefore, future development that would be permitted by the proposed TOD Plans would result in a *less-than-significant* impact related to the emissions or handling of hazardous materials within the vicinity of schools.

Methodology

Analysis in this impact discussion is focused on the potential of the proposed TOD Plans to result in hazardous emissions or handling of hazardous or acutely hazardous materials within one-quarter mile of an existing or proposed school. The potential severity of consequences to people or property at school facilities in the event of a release of hazardous materials into the environment from operation of new uses permitted by the TOD Plans is also analyzed.

In determining the level of significance, the analysis recognizes that all site-specific development and infrastructure projects permitted by the proposed TOD Plans would be required to comply with relevant federal, state, and local laws and regulations that are designed to minimize exposure to or release into the environment of hazardous or acutely hazardous materials, particularly within one-quarter mile of an existing or proposed school.

A significant impact would occur if (1) the proposed TOD Plans would permit uses that handle hazardous or acutely hazardous materials within one-quarter mile of an existing or proposed school and (2) such handling could result in the release of these materials into the environment due either to routine activities or an upset or accident condition.

Impact Assessment

There are two public schools located one-quarter mile of the TOD Plan areas: Oak Street Elementary and Bennet-Kew Elementary.

The standard construction materials that would be used in the construction of new development in the TOD Plan areas include use of common hazardous materials such as paints,

solvents, and adhesives; cleaning and other maintenance products; and diesel and other fuels used in construction equipment and vehicles. In addition, use of pesticides and fertilizers would occur as part of landscape maintenance. The TOD Plans provide for mixed urban land uses such as residential, retail, and office and do not include ne land that would handle acutely hazardous materials or generate hazardous emissions.

While the routine use, transport, and disposal of hazardous materials would occur associated with new uses the result of the TOD Plans as described in Impact HAZ-1, the types of uses that would emit or release hazardous or acutely hazardous materials into the environment -- typically industrial manufacturing facilities -- are not proposed by the TOD Plans. As noted above, the TOD Plans would result in a net reduction of industrial use. In addition, all businesses that handle or transport hazardous materials (such as dry cleaners or automotive repair shops) would be required to comply with the provisions of the federal, state, and local regulations for hazardous materials and wastes. The laws and regulations related to the hazardous emissions and handling and transport of hazardous materials are intended to minimize potential health risks associated with their use or the accidental release of such substances. Compliance with existing laws and regulations would minimize the risks associated with the exposure of sensitive receptors, including schools, to hazardous materials. Therefore, future site-specific development and infrastructure projects permitted by the proposed TOD Plan would result in a less-than-significant impact related to the emissions or handling of hazardous materials within the vicinity of schools.

Significance Conclusion for Impact HAZ-3

The proposed TOD Plans could permit businesses with the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-half mile of an existing or proposed school. Compliance with existing laws and regulations would minimize the risks associated with the exposure of sensitive receptors, including schools, to hazardous materials due to routine activities or upset/accident conditions. Therefore, future development that would be permitted by the proposed TOD Plans would result in a less-than-significant impact related to the emissions or handling of hazardous materials within the vicinity of schools.

Threshold HAZ-4: Be located on a site that 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.

Impact HAZ-4: Site-specific development projects permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans could include one or more locations included on a list of hazardous

materials sites. Compliance with federal, state, and local laws and regulations would require remediation of any such listed site or site that is identified as being affected by hazardous materials. These requirements for remediation would ensure that such sites are remediated prior to their physical development and that public health and the environment are protected from exposure to contaminants. Thus, a *less than significant* impact would result.

Methodology

The methodology used in this assessment includes review of database information to assess the potential presence of hazards and hazardous materials sites within the TOD Plan areas. The TOD Plan areas were evaluated for the presence of hazardous materials based on a review of the USEPA CERCLIS database, the DTSC EnviroStor database, and the Regional Water Quality Control (RWQCB) GeoTracker database. In addition, a Phase I Environmental Site Assessment Report (Leighton, 2012) that was prepared for numerous properties along the Crenshaw-LAX Metro line in the Westchester/Veterans TOD Plan area was reviewed for identification of existing contaminated properties.

To identify the level of significance in relation to this threshold, the first step is to determine whether the Specific Plan area encompasses any sites that are included on a list of hazardous materials sites or that contain unidentified/unknown contaminants. The analysis recognizes that all development would be required to comply with relevant federal, state, and local laws and regulations that are designed to remediate such sites so as to protect the public health.

A significant impact would occur if development would occur on a hazardous materials site that could endanger public health or the environment.

Impact Assessment

Known LUST cleanup sites are identified in **Table 3.11-2**. Because these LUST sites have undergone or are undergoing remediation per the regulations and oversight of the SWRCB, they do not create a significant hazard to the public or the environment. Per the DTSC EnviroStor database there are no other contaminated state agency monitored properties or Superfund sites within the TOD Planning areas. However, due to long-term urban uses in the TOD Plan areas, historical releases of hazardous substances into the soil could have occurred that are not included in current databases, and areas of contamination could be identified as part of site-specific development and infrastructure projects permitted by the proposed TOD Plans.

As discussed under Impact HAZ-2, development of sites that contain hazardous materials would be required to undergo remediation and cleanup activities under the supervision of the Los Angeles County Fire Department Hazardous Materials Division, DTSC, or Los Angeles RWQCB before construction activities can begin. Consequently, if future site-specific development permitted by the TOD Plans is located on a site that is included on a list of hazardous materials sites or is identified as being affected by hazardous materials, remediation requirements from federal, state, regional, and local agencies would ensure that such sites are remediated prior to their development and public health is protected from exposure to contaminants.

Significance Conclusion for Impact HAZ-4

Compliance with federal, state, and local laws and regulations would require remediation of any site that is included on a list of hazardous materials sites or is identified as being affected by hazardous materials prior to any future site-specific development permitted by the TOD Plans. Such remediation would ensure that such sites are remediated prior to their development and public health is protected from exposure to contaminants. Thus, a less than significant impact would result.

Threshold HAZ-5: Result in a safety hazard or excessive noise for people residing or working in the project area for a project located within an airport land use plan or, where such plan has not been adopted, be within 2 miles of a public airport use airport or public use airport.

Impact HAZ-5: The southwestern portion of the Westchester/Veterans TOD Plan area is located within 2 miles of Los Angeles International Airport (LAX) for which an airport land use plan has been adopted. The TOD Plan area is within the 65 dB CNEL for LAX but is outside of identified safety zones. The Crenshaw/Imperial TOD Plan area is outside of the airport influence area for the Hawthorne Municipal Airport. *No impact* related to airport hazards would occur.

Methodology

The first test in evaluating whether a significant impact would occur is to determine whether any portions of the TOD Plan areas are within an airport land use plan or within 2 miles of a public airport for which an airport land use plan has not been adopted. Within these areas, a significant impact would result if the TOD Plans would place new development within an airport safety zone or propose new residential development within a 65 dB CNEL noise contour.

Impact Assessment

The southwestern portion of the Westchester/Veterans TOD Plan area is located adjacent to an “Airport Landside” portion of the Los Angeles International Airport (LAX) and is less than one mile from an “Airport Airside” portion of LAX. As indicated in **Figure 3.10-6**, the existing residential area within the Westchester/Veterans TOD Plan that is located east of the I-405 freeway, south of Kelso Street is within the 65 dB CNEL noise contour of LAX. The Inglewood General Plan indicates that residential development is “Conditionally Acceptable” up to a 70 dB CNEL. According to the General Plan, “New construction or development should be undertaken only after detailed analysis of the noise reduction requirement is 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.” However, no new residential development is proposed within the 65 dB CNEL noise contour. The TOD Plan area is outside of any identified LAX safety areas.

The airport influence area of Hawthorne Municipal Airport does not extend north of the I-105 freeway and into the Crenshaw/Imperial TOD Plan area.

Significance Conclusion for Impact HAZ-5

The Westchester/Veterans TOD Plan area is located outside of identified safety zones of LAX. While the southwestern portion of the TOD Plan area is within the 65 dB CNEL noise contour of the airport, no new residential development is proposed within 65 dB CNEL noise contour. The Crenshaw/Imperial TOD Plan area is outside of the airport influence area for the Hawthorne Municipal Airport. No impact related to airport hazards or airport noise would occur.

Threshold HAZ-6: Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Impact HAZ-6: Site-specific development projects permitted by the proposed TOD Plans would not result in any permanent roadway closures that could present any physical barrier or hinder emergency access. Site-specific development projects permitted by the TOD Plans will be required to conform to applicable California Building Code and Fire Code standards, and the City’s would review each site-specific development project to ensure that emergency response plan or emergency implementation of an evacuation plan would not occur. Therefore, the proposed TOD Plans would not impair implementation of or physically

interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be *less than significant*.

Methodology

The following analysis determines whether the proposed Specific Plan would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan due to proposed site access or another configuration.

The following analysis determines whether the proposed TOD Plans would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan due to proposed site access or other configuration.

In determining the level of significance, the analysis assumes that if site-specific development and infrastructure projects permitted by the TOD Plans would interfere with implementation of an adopted emergency plan, impede evacuation routes, or restrict access of emergency response personnel, impacts would be considered significant. Conversely, compliance with relevant laws and regulations related to emergency access or an evacuation plan would result in less-than-significant impacts.

Impact Assessment

Construction

Construction of site-specific development projects permitted by the proposed TOD Plans would occur over a period of 20 years on discreet sites in various locations within the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas. As discussed in greater detail in Section 3.6, *Traffic and Circulation*, although temporary lane and sidewalk closures immediately adjacent to site-specific development projects may be necessary for short durations, adequate emergency vehicle access throughout the TOD Plan area would be maintained at all times as required by the Inglewood Police Department and Inglewood Fire Services Department (Los Angeles County Fire Department). All construction projects within the TOD Plan areas must comply with the California Fire Code (Chapter 33, Fire Safety During Construction and Demolition), which includes requirements to provide for access for firefighting (Section 3310) and providing an approved temporary means of egress (Section 3311).

As part of the review and approval of site-specific development projects within the TOD Plan areas, development plans will be reviewed by the City's police and fire agencies prior to construction to ensure that alternative route planning to facilitate the passage of people and vehicles through/around any temporary required road closures occurs and is implemented, if needed. Included in such plans would be provisions for any needed signage for detours,

training of flagmen, and provision for staging areas for emergency vehicles responding to a call, as required by the City's police and fire agencies. Thus, emergency access in and out of construction sites, including evacuation routes for construction workers, would remain during the construction process.

Operations

The City of Inglewood has adopted a Multi-Hazard Mitigation Plan and an Emergency Response Plan to reduce or eliminate long-term risks to human life and property from a variety of potential hazards. The Emergency Response Plan designates evacuation routes that include Florence Avenue and La Brea Avenue, Crenshaw Boulevard, Imperial Highway, La Cienega Boulevard, and the I-405, and I-105 freeways in the City of Inglewood (DWP, 2016). The TOD Plans would expand and improve access to transit, and provide improvements for pedestrian and bicycle transportation modes, which would provide for various methods of evacuation in an emergency situation. In addition, the TOD Plans would develop neighborhood connectors that are intended to link various portions of the City and provide additional evacuation routes and emergency access.

No permanent roadway closures are proposed that would create any physical barrier or hinder emergency access. The only permanent road closure that might occur as the result of the proposed TOD Plans is the potential future closure of Isis Avenue north of Manchester Boulevard for open space. Because Isis Avenue does not cross the Metro rail line, connectivity for the area would be maintained via Aviation Boulevard/Florence Avenue, Manchester Boulevard, and Hindry Avenue, as is the present situation for uses in this area. Thus, the TOD Plans would not result in impeding evacuation routes or restricting access of emergency personnel. In addition, the operational effect of the proposed TOD Plan would improve the existing evacuation facilities through the circulation improvements.

Future site-specific development projects permitted by the TOD Plans would be required to conform to applicable California Building Code and Fire Code standards, such as internal access and fire suppression facilities, which would be verified through the City's review process for each site-specific development project to ensure that emergency response plan or emergency implementation of an evacuation plan would not occur. Therefore, the proposed TOD Plans would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Significance Conclusion for Impact HAZ-6

The proposed TOD Plans would not result in any permanent roadway closures that could present any physical barrier or hinder emergency access. Site-specific development projects permitted by the TOD Plans will be required to conform to applicable California Building Code

and Fire Code standards, and the City's would review each site-specific development project to ensure that emergency response plan or emergency implementation of an evacuation plan would not occur. Therefore, the proposed TOD Plans would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Threshold HAZ-7: Expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Impact HAZ-7: The City of Inglewood is a built-out urban community and future site-specific development within the TOD Plan areas would not interface with any wildlands or an area classified as a Fire Hazard zone. No impact related to exposure of people to wildland fires would occur.

Methodology

A significant impact would occur if development were proposed within or adjacent to a high fire hazard zone or within a wildland-urban interface.

The first test is to determine whether any portions of the Westchester/Veterans or Crenshaw/Imperial TOD Plan areas are within or adjacent to a wildland area where a wildland/urban interface would exist. Because the proposed TOD Plan areas are located within a fully developed urban setting where no wildland/urban interface exists, further analysis of wildland fire risks was determined not to be necessary.

Impact Assessment

Wildfire hazard areas are commonly identified in regions of the wildland/urban interface. However, the City of Inglewood is an entirely built-out urban community that is characterized (and surrounded) by a mix of residential, commercial, and industrial areas, and does not interface with any wildlands or an area classified as a Fire Hazard zone (CalFire, 2007). In addition, there are no specific areas in the City that are more vulnerable to fire than others (City, 2016).

Significance Conclusion for Impact HAZ-7

Because the City of Inglewood is an entirely built-out urban community and does not interface with any wildlands or an area classified as a Fire Hazard zone, impacts related to exposure of people to wildland fires would not occur.

3.11.6 REFERENCES - HAZARDS AND HAZARDOUS MATERIALS

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3.12 HYDROLOGY AND WATER QUALITY

3.12.1 INTRODUCTION

a. Overview

This section addresses hydrology and water quality issues associated with the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans and evaluates the potential for environmental impacts related to surface and groundwater quality, groundwater supplies, erosion, flood zones, levee and dam failure, and inundation due to seiche, tsunami, or mudflow.

Issues related to the capacity and construction of construction of stormwater drainage facilities are addressed in Section 3.16, *Utilities, Service Systems, and Water Supply*.

b. Definitions

100-Year Flood is a flood that has a 1 percent statistical chance of occurring in any given year. The 100-year flood can, however, occur in consecutive years or multiple times within a year.

100-Year Storm is a storm that has a 1 percent statistical chance of occurring in any given year. The 100-year storm can, however, occur in consecutive years or multiple times within a year.

Aquifer refers to a body of rock or sediment that is sufficiently porous and permeable to store, transmit, and yield significant or economic quantities of groundwater to wells and springs.

Area of Shallow Flooding includes lands designated as Zone AO, AH, or VO on the Flood Insurance Rate Map (FIRM). The base flood depths range from 1 to 3 feet; a clearly defined channel does not exist; the path of flooding is unpredictable and indeterminate; and velocity flow may be evident. Such flooding is characterized by ponding or sheet flow.

Area of Special Flood Hazard includes lands in the floodplain within a community subject to a 1 percent or greater chance of flooding in any given year; sometimes referred to as the “Base Flood.” This area is designated as Zone A, AO, AH, A1-A30, AE, A99, VO, V1-30, VE, or V on the FIRM.

Base Flood is a flood having a 1 percent chance of being equaled or exceeded in any given year (also called the “100-year flood”).

Basin Plan refers to a water quality control plan developed permitted by the federal Clean Water Act¹ Section 13240. The Basin Plan is a master policy document that contains descriptions of the legal, technical, and programmatic bases of water quality regulation in the region. The Basin Plan must include (1) a statement of beneficial water uses that the Regional Water Quality Control Water Board (RWQCB) will protect, (2) the water quality objectives needed to protect the designated beneficial water uses, and (3) the strategies and time schedules for achieving the water quality objectives. Factors to be considered by a RWQCB in establishing water quality objectives must include, but are not necessarily limited to, all of the following: (1) past, present, and probable future beneficial uses of water; (2) environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto; (3) water quality conditions that could reasonably be achieved through the coordinated control of all factors which affect water quality in the area; (4) economic considerations; (5) the need for developing housing within the region; and (6) the need to develop and use recycled water.

Best Management Practices (BMPs), in relation to stormwater management, are control measures taken to mitigate changes to both quantity and quality of urban runoff caused through changes to land use. BMPs are designed to reduce stormwater volume, peak flows, and/or nonpoint source pollution through evapotranspiration, infiltration, detention, and filtration or biological and chemical actions. Stormwater BMPs are often classified as “structural” (i.e., devices installed or constructed on a site) or “non-structural” (procedures, such as modified landscaping practices). The U.S. Environmental Protection Agency (USEPA) publishes lists of stormwater BMPs for use by local governments, builders, and property owners.

FEMA refers to the Federal Emergency Management Agency.

Flood Insurance Rate Map (FIRM) refers to the official map on which the Federal Insurance and Mitigation Administration has delineated both the Areas of Special Flood Hazards and the risk premium zones applicable to the community.

Flooded refers to any condition in which the soil surface is temporarily covered with flowing water from any source, such as streams overflowing their banks, runoff from adjacent or surrounding slopes, inflow from high tides, or any combination of sources.

¹ The Clean Water Act (CWA) was originally known as the Federal Water Pollution Control Act of 1948, which was the first major U.S. law to address water pollution. Concern for controlling water pollution led to sweeping amendments in 1972. As amended in 1972, the law became commonly known as the Clean Water Act (CWA).

Frequency (Inundation) refers to the average frequency of flooding by surface water or soil saturation. It is usually expressed as the number of years (e.g., 50 years) the soil is inundated or saturated at least once during a year.

Groundwater includes water that occurs beneath the land surface and fills the pore spaces of the alluvium, soil, or rock formation in which it is situated. It excludes soil moisture, which refers to water held by capillary action in the upper unsaturated zones of soil or rock.

Groundwater Basin refers to any basin identified in the California Department of Water Resources “California’s Groundwater: Bulletin No. 118” (September 1975, updated 2003), and any amendments to that bulletin, but does not include a basin in which the average well yield, excluding domestic wells that supply water to a single-unit dwelling, is less than 100 gallons per minute.

Groundwater Table refers to the upper surface of the zone of saturation in an unconfined aquifer.

Hydrologic Conditions of Concern represent a combination of upland hydrologic conditions and stream biological and physical conditions that present a condition of concern for physical and/or biological degradation of streams.

Hydromodification refers to any activity that increases the velocity and volume (flow rate)—and often the timing—of runoff, such as development of impervious surfaces, vegetation removal, dredging/filling, or other alterations to natural land contours for the purposes of new development.

Inundation is the condition in which water from any source temporarily or permanently covers a land surface.

Low Impact Development (LID) is an approach to land development that uses various land planning and design practices and technologies to simultaneously conserve and protect natural resource systems and reduce infrastructure costs. Typically, emphasis is on employing natural and constructed features that reduce the rate of stormwater runoff, filter out pollutants, facilitate stormwater storage on-site, infiltrate stormwater into the ground to replenish groundwater supplies, or improve the quality of receiving groundwater and surface water.

Mudflow refers to a landslide composed of saturated rock debris and soil with a consistency of wet cement.

National Flood Insurance Program (NFIP) is the federal program that authorizes the sale of federally subsidized flood insurance in communities where such flood insurance is not available privately.

National Pollutant Discharge Elimination System (NPDES) refers to the provision of the federal Clean Water Act that prohibits discharge of pollutants into waters of the United States unless a special permit is issued by the USEPA, a state, or another delegated agency.

Nonpoint Source Pollution refers to pollution that enters water from dispersed and uncontrolled sources, such as surface runoff, rather than through pipes. Nonpoint sources (e.g., landscape practices, on-site sewage disposal, and automobiles) may contribute pathogens, suspended solids, and toxicants. While individual sources may seem insignificant, the cumulative effects of nonpoint source pollution can be significant.

Non-Stormwater Discharge includes any discharge that is not entirely composed of stormwater except those noted within an NPDES permit.

Pollutant of Concern refers to a contaminant that would contribute to impairments in downstream receiving waters.

Receiving Waters refers to water bodies, (including streams or rivers, existing lakes, or the ocean) that receive treated or untreated runoff from upland areas.

Seiche is a surface wave created when a body of water is shaken, usually by earthquake activity.

Stormwater refers to discharges generated by runoff from land and impervious areas, such as paved streets, parking lots, and building rooftops, during rainfall and snow events that often contain pollutants in quantities that could adversely affect water quality. Most stormwater discharges are considered point sources and require coverage by a NPDES permit.

Surface Water refers to water present above the substrate or soil surface.

Total Maximum Daily Loads (TMDLs) is a regulatory term in the U.S. Clean Water Act, describing a plan for restoring impaired waters that identifies the maximum amount of a pollutant that a body of water can receive while still meeting water quality standards.

Tsunami refers to the ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. Tsunamis are sometimes referred to as “tidal waves” due to their common appearance as that of an extraordinarily high, rapidly rising, and forceful tide. The use of this term to describe tsunamis is discouraged by the scientific community, however.

3.12.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

The proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans is subject to a range of federal, state, regional, and local plans, policies, and regulations, which are described below.

a. Federal Plans, Policies, and Regulations**Clean Water Act**

The Clean Water Act established the basic structure for regulating discharges of pollutants into “waters of the U.S.” The act specifies a variety of regulatory and non-regulatory tools to sharply reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. Key components of the Clean Water Act that are relevant to the proposed TOD Plans are as follows:

- Sections 303 and 304, which provide for water quality standards, criteria, and guidelines. Section 303(d) requires the state to develop lists of water bodies that do not attain water quality objectives (are impaired) after implementation of required levels of treatment by point-source dischargers (municipalities and industries). Section 303(d) also requires that the state develop TMDLs for each of the listed pollutants. The TMDL is the amount of pollutant loading that the water body can receive and still comply with water quality objectives. After implementation of the TMDL, it is anticipated that the contamination that led to the 303(d) listing would be remediated. Preparation and management of the Section 303(d) list are administered by the RWQCBs.
- Section 401 requires every applicant for a federal permit or license for any activity that may result in a discharge to a water body to obtain a water quality certification that the proposed activity would comply with applicable water quality standards.
- Section 402 regulates point- and nonpoint-source discharges to surface waters through the NPDES program. In California, the State Water Resources Control Board (SWRCB) oversees the NPDES program, which is administered by the RWQCBs. The NPDES program provides for both general permits (those that cover a number of similar or related activities) and individual permits.
- Section 404 establishes a program to regulate the discharge of dredged or fill material into “waters of the United States,” including wetlands. Activities in waters of the United States regulated under this program include fill for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports) and mining projects. Section 404 requires a permit before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulation (e.g., certain farming and forestry activities).
- The basic premise of the 404 program is that no discharge of dredged or fill material may be permitted if (1) a practicable alternative exists that is less damaging to the aquatic environment, or (2) the nation’s waters would be significantly degraded. In other words, permit applicants must show that steps have been taken to avoid impacts on wetlands, streams, and other aquatic resources; that potential impacts have been

minimized; and that compensation will be provided for all remaining unavoidable impacts.

- Proposed activities are regulated through a permit review process. For most discharges that will have only minimal adverse effects, a “general permit” may be suitable. General permits are issued on a nation-wide, regional, or state basis for particular categories of activities. The general permit process eliminates individual review and allows certain activities to proceed with little or no delay, provided that the applicable conditions for the general permit are met. For example, minor road improvements and utility lines are activities that can be considered for a general permit. States also have a role in Section 404 decisions, through state program general permits, water quality certification, or program assumption.
- An individual permit is required for potentially significant impacts. Individual permits are reviewed by the U.S. Corps of Engineers, which evaluates applications under a public interest review, as well as the environmental criteria set forth in the Clean Water Act Section 404(b)(1) Guidelines, regulations promulgated by USEPA.

National Pollutant Discharge Elimination System (NPDES)

The NPDES permit system was established in the Clean Water Act to regulate municipal and industrial discharges to the surface waters of the United States. Section 402 of the Clean Water Act contains general requirements regarding NPDES permits. Section 307 of the Clean Water Act describes the factors that USEPA must consider in setting effluent limits for priority pollutants.

The purpose of the NPDES municipal program is to establish a comprehensive water quality program to manage urban stormwater in order to minimize pollution of the environment to the maximum extent practicable. The NPDES program consists of characterization of the receiving water quality, identification of harmful constituents, identification of potential sources of pollutants, and implementation of a Comprehensive Storm Water Management Program. One of the primary objectives of water quality regulations, including the NPDES program, is the reduction of pollutants and sediments in urban stormwater runoff to the maximum extent possible through the use of BMPs.

There are two categories of BMPs: structural and non-structural. Structural BMPs involve the specific construction, modification, operation, maintenance, or monitoring of facilities to minimize the introduction of pollutants from the drainage system. Non-structural BMPs are activities, programs, and other non-physical measures that would contribute to the reduction of pollutants from nonpoint source pollutants to the drainage system.

National Flood Insurance Program

The City of Inglewood is a participant in the National Flood Insurance program (NFIP), which is administered by the Federal Emergency Management Agency (FEMA). Participants in the NFIP must satisfy certain mandated floodplain management criteria, including adopting an ordinance that complies with minimum regulatory standards issued by FEMA and monitoring construction and building permits and the status of the City ordinance to ensure that all comply with federal laws and regulations.

Established in 1968 with the passage of the National Flood Insurance Act, the NFIP is a federal program enabling property owners in participating communities to purchase insurance as a protection against flood losses in exchange for state and community floodplain management regulations that reduce future flood damages. Participation in the NFIP is based on an agreement between communities and the federal government. If a community adopts and enforces a floodplain management ordinance to reduce future flood risk to new construction in floodplains, the federal government will make flood insurance available within the community as a financial protection against flood losses. This insurance is designed to provide an affordable insurance alternative to disaster assistance to reduce the escalating costs of repairing damage to buildings and their contents caused by floods. Communities are occasionally audited by the California Department of Water Resources to ensure the proper implementation of FEMA floodplain management regulations.

However, the City of Inglewood does not include any areas designated as a Special Flood Hazard Area, which are subject to a one percent chance or greater chance of flooding in any one year (100-year flood zone). The City of Inglewood is designated a Non-Special Flood Hazard Area and is considered by the NFIP to have a low to medium probability of flooding, and historically has experienced no flood events (City, 2010).

b. State Plans, Policies, and Regulations

Porter-Cologne Act

The SWRCB and the RWQCB share the responsibility under the Porter-Cologne Act to formulate and adopt water policies and plans, and to adopt and implement measures to fulfill Clean Water Act requirements. In order to meet this requirement for the Los Angeles area, the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) (discussed below) was prepared by the RWQCB to protect the water quality of the state according to the beneficial uses identified for each water body. Prior to authorizations of waste discharge by the RWQCB, the Porter-Cologne Act requires reports of waste discharges to be filed. The RWQCB then prescribes Waste Discharge Requirements, which serve as NPDES permits under a provision of the Porter-Cologne Act.

Anti-Degradation Policy

A key policy of California's water quality program is the state's Anti-Degradation Policy. This policy, formally known as the Statement of Policy with Respect to Maintaining High Quality Waters in California (SWRCB Resolution No. 68-16), restricts degradation of surface and ground waters. In particular, this policy protects water bodies where existing quality is higher than necessary for the protection of beneficial uses. Under the Anti-Degradation Policy, any actions that can adversely affect water quality in all surface and ground waters must (1) be consistent with maximum benefit to the people of the state, (2) not unreasonably affect present and anticipated beneficial use of the water, and (3) not result in water quality less than that prescribed in water quality plans and policies, (i.e., will not result in exceedances of water quality objectives) (SWRCB 1968).

Construction General Permit

The State of California adopted a Statewide NPDES Permit for General Construction Activity (Construction General Permit) on September 2, 2009 (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The last Construction General Permit amendment became effective on February 16, 2012. The Construction General Permit regulates construction site stormwater management. Dischargers whose projects disturb 1 or more acres of soil, or whose projects disturb less than 1 acre but are part of a larger common plan of development that in total disturbs 1 or more acres, are required to obtain coverage under the general permit for discharges of stormwater associated with construction activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.

To obtain coverage under this permit, project operators must electronically file Permit Registration Documents, which include a Notice of Intent, a Storm Water Pollution Prevention Plan (SWPPP), and other compliance-related documents, including a risk-level assessment for construction sites, an active stormwater effluent monitoring and reporting program during construction, rain event action plans, and numeric action levels (NALs) for pH and turbidity as well as requirements for qualified professionals to prepare and implement the plan. An appropriate permit fee must also be mailed to SWRCB.

The Construction General Permit requires the SWPPP to identify BMPs that will be implemented to reduce potential chemical contaminants that would affect water quality. Types of BMPs include erosion control (e.g., preservation of vegetation), sediment control (e.g., fiber rolls), non-storm-water management (e.g., water conservation), and waste management. The SWPPP also includes descriptions of BMPs to reduce pollutants in stormwater discharges after all construction phases have been completed at the site (post-construction BMPs).

Recycled Water General Permit for Landscape Irrigation

In July 2009, the SWRCB released General Waste Discharge Requirements for Landscaping Irrigation Uses of Municipal Recycled Water (Recycled Water General Permit), allowing municipal entities to distribute disinfected tertiary-treated recycled water to select customers for landscape irrigation (Order No. 2009-0006-DWQ). The Recycled Water General Permit is intended to further the state's Recycled Water Policy (California Code of Regulations [CCR] Title 22) and California Water Code Section 13552.5, both of which encourage recycled water for non-potable uses.

Under the Recycled Water General Permit, recycled water is limited to recycled water produced by a public entity at a municipal wastewater treatment plant. The Recycled Water General Permit does not apply to water produced from the treatment of other non-municipal wastewaters (e.g., oil field production, food processing, stormwater, etc.) and other types of treatment facilities (e.g., industrial wastewater treatment plants). To obtain coverage under the Recycled Water General Permit, the producer/distributor of recycled water must submit a Notice of Intent (NOI) and Operations and Maintenance Plan to the SWRCB. The Operations and Maintenance Plan must contain a detailed operations plan for use areas, including procedures for implementation of regulations regarding recycled water use and maintenance of equipment and emergency backup systems to maintain compliance with the conditions of the Recycled Water General Permit. In addition, it must have an irrigation management plan specifying measures to ensure that recycled water is applied efficiently, at an agronomic rate, and using practices necessary to minimize application of salinity constituents to use areas. Characteristics of the soil, the recycled water, plant species being irrigated, climatic conditions, and other relevant conditions must be considered in this plan.

The Recycled Water General Permit notes that the use of recycled water may not be appropriate for all situations because of unique site-specific characteristics and conditions. In addition, because there are certain public health concerns associated with recycled water, the Recycled Water General Permit includes exposure control measures, including minimum setback distances, signage, method of application, and use restrictions and only allows use of water treated to CCR Title 22 tertiary treatment requirements. Other potential public health issues, such as cross-contamination of recycled water and potable water sources, control of recycled water salinity, and chlorination, are regulated under the Recycled Water Policy and the Water Code. Landscape irrigation with recycled water would require coverage under this Recycled Water General Permit or an individual permit.

State Water Resources Control Board Low Impact Development Policy

The SWRCB adopted the Low Impact Development Policy which, at its core, promotes the idea of "sustainability" as a key priority in the design and planning process for future development.

The SWRCB has directed its staff to consider sustainability in all future policies, guidelines, and regulatory actions.

The intent of the LID policy is to benefit water supply, contribute to water quality protection, and manage stormwater. The RWQCBs are advancing LID in California in various ways, including provisions for LID requirements in renewed Phase I municipal stormwater NPDES permits.

c. Regional and Local Plans, Policies, and Regulations

Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties

The Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan designates beneficial uses for surface and ground waters, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy, and describes implementation programs to protect all waters in the region. Required construction permits that are issued to control pollution (i.e., waste-discharge requirements and NPDES permits) must implement the Basin Plan requirements (i.e., water quality standards), taking into consideration the beneficial uses to be protected.

Los Angeles County Municipal Separate Storm Sewer System Permit

The current Municipal Separate Storm Sewer System (MS4) Permit for Los Angeles County (NPDES Permit No. CAS004001) was adopted on November 8, 2012, became effective December 28, 2012, and was most recently amended by the State Water Board on July 9, 2018. This permit includes Los Angeles County Flood Control District, County of Los Angeles, and 84 incorporated cities within Los Angeles County watersheds excluding the City of Long Beach. The permit contains requirements to reduce the discharge of pollutants in stormwater runoff to the maximum extent practicable and provides achieve water quality standards. In addition, the MS4 Permit requires that runoff be addressed during the major phases of urban development (planning, construction, and operation) in order to reduce the discharge of pollutants from storm water to the maximum extent practicable, effectively prohibit non-storm water discharges and protect receiving waters.

The MS4 Permit also includes construction requirements for implementation of minimum construction site BMPs for erosion, sediment, non-storm water management and waste management on construction sites, which are listed in **Table 3.12-1**; and additional BMPs applicable to construction sites that disturb one-acre or more (as listed in **Table 3.12-2**).

TABLE 3.12-1: MINIMUM BMPs FOR CONSTRUCTION SITES

Erosion Controls	Scheduling Preservation of Existing Vegetation
Sediment Controls	Silt Fence Sandbag Barrier Stabilized Construction Site Entrance/Exit
Non-Storm Water Management	Water Conservation Practices Dewatering Operations
Waste Management	Material Delivery and Storage Stockpile Management Spill Prevention and Control Solid Waste Management Concrete Waste Management Sanitary/Septic Waste Management

Source: MS4 Order No. R4-2012-0175, 2015.

The permit also requires the design and implementation of specific post-construction controls to mitigate storm water pollution, prior to project completion, for all “new development” and “redevelopment” projects that meet certain criteria as specified in the permit. During operation of new development or redevelopment, the permit prohibits non-storm water discharges from the development (with some conditional exceptions) and requires BMPs to eliminate discharges to the MEP. Storm water effluent must meet water-quality based effluent limitations (WQBELs), or water quality standards for discharge leaving the site, and must not cause or contribute to the exceedance of receiving water limitations (water quality standards for receiving waters). The permit requires each permittee to implement a Planning and Land Development Program for all new development, which requires permittees to:

- Lessen the water quality impacts of development by using smart growth practices such as compact development, directing development towards existing communities via infill or redevelopment, and safeguarding of environmentally sensitive areas.
- Minimize the adverse impacts from storm water runoff on the biological integrity of Natural Drainage Systems and the beneficial uses of water bodies in accordance with requirements under CEQA (Cal. Pub. Resources Code Section 21000 et seq.).

TABLE 3.12-2: ADDITIONAL BMPs APPLICABLE TO CONSTRUCTION SITES DISTURBING ONE-ACRE OR MORE

Erosion Controls	Hydraulic Mulch Hydroseeding Soil Binders Straw Mulch Geotextiles and Mats Wood Mulching
Sediment Controls	Fiber Rolls Gravel Bag Berm Street Sweeping or Vacuum Storm Drain Inlet Protection Scheduling Check Dam
Additional Controls	Wind Erosion Controls Stabilized Construction Entrance/Exit Stabilized Construction Roadway Entrance/ Exit Tire Wash
Non-Storm Water Management	Vehicle and Equipment Washing Vehicle and Equipment Fueling Vehicle and Equipment Maintenance
Waste Management	Material Delivery and Storage Spill Prevention and Control

Source: MS4 Order No. R4-2012-0175, 2015.

- Minimize the percentage of impervious surfaces on land developments by minimizing soil compaction during construction, designing site-specific development and infrastructure projects to minimize the impervious area footprint, and employing LID design principles to mimic predevelopment hydrology through infiltration, evapotranspiration and rainfall harvest and use.
- Minimize pollutant loadings from impervious surfaces such as roof tops, parking lots, and roadways through the use of properly designed, technically appropriate BMPs (including Source Control BMPs such as good housekeeping practices), LID Strategies, and Treatment Control BMPs.
- Properly select, design, and maintain LID and Hydromodification Control BMPs to address pollutants that are likely to be generated, reduce changes to pre-development hydrology, assure long-term function, and avoid the breeding of vectors.
- Prioritize the selection of BMPs to remove storm water pollutants, reduce storm water runoff volume, and beneficially use storm water to support an integrated approach to protecting water quality and managing water resources in the following order of preference:

- On-site infiltration, bioretention and/or rainfall harvest and use.
- On-site biofiltration, off-site ground water replenishment, and/or off-site retrofit.

Los Angeles County Standard Urban Storm Water Mitigation Plan

The Los Angeles County Standard Urban Storm Water Mitigation Plan (SUSMP) was written for compliance with MS4 Permit requirements, and outlines the MS4 Permit BMPs (described in **Tables 3.12-1** and **3.12-2**, above) that are required to be incorporated into design plans for site-specific development and infrastructure projects, such as the following:

- Ten or more dwelling units (includes single-family homes, multi-family homes, condominiums, and apartments);
- Automotive service facilities (SIC codes 5013, 5014, 5541, 7532-7534, and 7536-7539);
- Restaurants (SIC code 5812);
- 100,000 square feet or more of impervious surface in industrial/commercial
- Retail gasoline outlet;
- Parking lot 5,000 square feet or more of surface area or with 25 or more parking spaces;
- Redevelopment projects in subject categories that meet redevelopment thresholds (SUSWMP 2000).

Site-specific development projects permitted by the TOD Plans that satisfy any of the categories identified above would be required to comply with the County SUSMP submittal requirements as specified on the County SUSMP Review Checklist and listed below:

- Provide a hydrology analysis to determine the design flow rate (QPM) or Volume (VM) for the first 3/4-inch of rainfall that must be treated.
- Submit site specific hydraulic calculations along with the recommended structural BMP manufacturer's product specifications to verify the BMP will adequately handle the minimum design flow required for treatment.
- Show locations of BMPs on building/drainage plans.
- Determine and provide the pre and post development pervious and impervious areas created by the proposed development.
- Submit Operation and Maintenance Guidelines that include the designated responsible party to manage the SUSMP devices, employee's training program and duties, operating schedule, maintenance frequency, routine service schedule, specific maintenance activities, copies of resource agency permits. Inspection and servicing of all SUSMP devices must occur on an annual basis at a minimum.

The County lists example BMPs to be implemented on sites; examples of these include using minimum pavement widths and permeable pavement, directing of rooftop runoff to pervious

areas, and including vegetated swales and strips and infiltration basins throughout the development (SUSWMP, 2000).

d. Local Plans, Policies, and Regulations

City of Inglewood General Plan

The City of Inglewood General Plan does not contain any specific hydrology or water quality related policies that are relevant to the proposed TOD Plans.

City of Inglewood Municipal Code

Section 10-202 of the Inglewood Municipal Code addresses water quality and stormwater runoff. The purpose of this Section is to protect and improve water quality of receiving waters by prohibiting illicit discharges to the municipal separate storm sewer system (MS4); detecting and eliminating illicit connections to the municipal storm water system; reducing pollutants in storm water discharges to the MS4 from sources, including but not limited to, construction sites, development and redevelopment projects, commercial establishments, industries, and any other source of storm water and non-storm water runoff pollution over which the City has control.

Municipal Code Section 10-208, Low Impact Development Requirements for New Development and Redevelopment, establishes requirements for construction activities and operations of site-specific development projects to comply with the current MS4 Permit (Order No. R4-2012-0175); lessen the water quality impacts of development by using smart growth practices; and to integrate LID practices and standards for stormwater pollution mitigation through means of infiltration, evapotranspiration, biofiltration, and rainfall harvest and use.

Although the City of Inglewood does not lie in any mapped floodplain areas as defined by the Federal Emergency Management Agency (FEMA), the City has adopted floodplain management regulations in Chapter 10, Article 15 of the Municipal Code. The purpose of the article is to promote the public health, safety, and general welfare and to minimize public and private losses due to flood conditions in specific areas.

3.12.3 ENVIRONMENTAL SETTING

a. Watersheds

The City of Inglewood is located within the boundaries of three watersheds: Los Angeles, Ballona, and Dominguez.

The portion of the Westchester/Veterans TOD Plan area located east of the I-405 freeway is within the Ballona Watershed, which encompasses a total of 1,936 acres, which is (33 percent of

the total City area, while the portion of the Westchester/Veterans TOD Plan area located west of the I-405 freeway and the Crenshaw/Imperial TOD Plan area are within the Dominguez Watershed (City, 2006).

The Dominguez Watershed makes up the greatest portion of the City and covers approximately 3,900 acres or approximately 67 percent of the City of Inglewood. The Dominguez Watershed is comprised of approximately 133 square miles of land and water in the southern portion of Los Angeles County. Approximately 81 percent of the watershed or 93 percent of the land is developed. Residential development covers nearly 40 percent of the watershed, and another 41 percent is made up by industrial, commercial and transportation uses (County 2018). Rather than being defined by the natural topography of its drainage area, the Dominguez watershed boundary is defined by a complex network of storm drains and smaller flood control channels. The Dominguez Channel extends from the Los Angeles International Airport to the Los Angeles Harbor and drains large, if not all, portions of the cities of Inglewood, Hawthorne, El Segundo, Gardena, Lawndale, Redondo Beach, Torrance, Carson, and Los Angeles. Other land areas within the watershed drain to several debris basins and lakes or directly to the Los Angeles and Long Beach Harbors.

Ballona Creek is a nine-mile long flood protection channel that drains the Los Angeles basin, from the Santa Monica Mountains on the north, the Harbor Freeway (SR-110) on the east, and the Baldwin Hills on the south. The Ballona Creek Watershed totals about 130 square miles and is highly developed: residential (64 percent), vacant/open space (17 percent), commercial (8 percent), and industrial (4 percent) are the predominant land uses (County 2016). Overall, more than 49 percent of the watershed is covered by roads, rooftops, and other impervious surfaces (City of Los Angeles, 2016). The watershed is fed by a network of underground storm drains, and major tributaries of the watershed include Centinela Creek, Sepulveda Channel, and Benedict Canyon Channel.

b. Groundwater Basin

The City of Inglewood and the TOD Plan areas are located above the West Coast Groundwater Basin (Basin). The Basin underlies a 160 square mile area in the southwestern part of the Los Angeles Coastal Plain in Los Angeles County. The storage capacity of the primary aquifer in the Basin is estimated to be 6,500,000 acre-feet, and because the area is generally impervious, recharge of the basin is largely from injection wells and infiltration of surface flows (DWR, 2004).

The Basin provides groundwater to eleven cities and unincorporated areas of Los Angeles County with an average annual production of roughly 52,000 acre-feet, which accounts for 20 percent of retail water demands (West Basin, 2018). In 1961, the Basin was adjudicated, which limits the allowable annual extraction of groundwater per water rights holder in order to

prevent seawater intrusion and a substantial lowering of the groundwater level. As part of the adjudication, the Court appointed the California Department of Water Resources (DWR) to serve as Watermaster to account for all water rights and groundwater extraction amounts per year. Adjudicated rights to groundwater are 64,468.25 acre-feet annually.

Since water demand and the production of groundwater from the adjudicated basin is substantially higher than the natural recharge of the Basin, the California Legislature created the Water Replenishment District of Southern California (WRD) in 1959 to manage, regulate and replenish the West Coast Basin.

On December 5, 2014, the West Coast Basin Judgment was amended (Amended Judgment). The Amended Judgment established a new Watermaster structure, which replaces the DWR. The new Watermaster structure includes an Administrative Body, a Water Rights Panel, and a Storage Panel. The Administrative Body administers the Watermaster accounting and reporting functions. The Water Replenishment District of Southern California (WRD) was appointed by the court to fulfill this role. The Water Rights Panel enforces issues related to the pumping rights within the adjudications and is composed of five West Coast Basin adjudicated rights holders. In addition, the Storage Panel is comprised of the Water Rights Panel and the WRD Board of Directors, which together approve certain groundwater storage efforts.

Each year, WRD determines the amount of supplemental recharge that is needed for the basin based upon annual groundwater extractions and groundwater levels. As part of the recharge and protective duties, WRD procures imported water and recycled water.

During the 2016-2017 water year (which runs from to July 1 to June 30), parties to the adjudication had a total water use of 189,187 acre-feet of water in comparison to adjudicated rights of 64,468.25 acre-feet from the basin. The total water use of 189,187 acre-feet was met with 26,805 acre-feet of water extracted from the basin, 23,317 acre-feet of recycled water, and 139,075 acre-feet of imported water (WRD 2018).

The City of Inglewood has an adjudicated share of the groundwater supply and is entitled to pump 4,449.89 acre-feet of groundwater annually (WRD, 2018), in addition to any carryover or unused water rights from the previous year. In the 2016-2017 water year, the City had a carryover of 4,396.89 acre-feet from previous years, and thus had the right to pump 8,846.78 acre-feet. The City pumped 2,842.57 acre-feet of water from the West Coast Groundwater Basin, leaving a balance of 6,364.21 acre-feet of water unused (WRD, 2018). Per the provisions of the adjudication, the City was permitted to carryover 4,449.89 acre-feet of groundwater to the next water year. The remainder of the City's water supply was imported water purchased from the Metropolitan Water District (6,293 acre-feet) and recycled water (834 acre-feet) (WRD, 2018).

c. Water Quality

The Los Angeles Regional Water Quality Control Board (LA RWQCB) assigns various existing, intermittent, and potential beneficial uses to the water bodies within its jurisdiction; water quality objectives are then implemented to ensure the protection of the water quality. Ballona Creek Watershed and its tributaries are impaired by pollutants (i.e., trash, metals, bacteria, nutrients) generally because of the watershed's large, dense population, urban development, and the amount of impervious ground surface that prevents large quantities of runoff from infiltrating into the soils. Thus, beneficial uses of the watershed are impaired.

Within the TOD Plan areas, the Ballona Creek Watershed is included on the Section 303(d) list of impaired waterbodies for dissolved copper, dissolved lead, total selenium, dissolved zinc, and toxicity (LA RWQCB, 2015). The metals subject to this TMDL are toxic pollutants, and the water quality objectives for the metals reflect national policy that the discharge of toxic pollutants in toxic amounts be prohibited. The designated beneficial uses in Ballona Creek (water contact recreation; non-contact water recreation; warm freshwater habitat; and wildlife habitat) are impaired by these metals: (LA RWQCB, 2015).

d. Drainage

The City is generally flat and there are no waterbodies located in the City or the TOD Plan areas. Approximately 93 percent of the City, including the TOD Plan areas, is comprised of a broad coastal plain that slopes gently from the east to the southwest with a gradient between zero and five degrees. Additionally, due to the urban and developed nature of the City, the TOD Plan areas are largely covered with impermeable surfaces, and sheet flow stormwater runoff is managed by an existing system of storm drains.

The main storm drain lines within the TOD Plan areas are owned and maintained by the Los Angeles County Flood Control District (LACFCD) and the City of Inglewood. The City owns and maintains approximately 12 miles of drainage pipelines and 464 catch basins; the LACFCD has approximately 42 miles of storm drain pipelines and 889 catch basins within the City of Inglewood.

The storm drain main lines within the TOD Plan areas consist of reinforced concrete pipe (RCP) that varies from 24- to 96-inches in diameter and reinforced concrete box (RCB) structures. The City of Inglewood drainage system drains into the various tributaries of each watershed discussed above. Typically, these areas are predominately channelized and highly developed with both commercial and residential properties. Most of the drainage networks are controlled by structural flood control measures, including debris basins, storm drains, underground culverts, and open concrete channels (City, 2010).

e. Flood Zones and Inundation Areas

The City of Inglewood does not include any areas designated as a Special Flood Hazard Area, which are subject to a one percent chance or greater chance of flooding in any one year (100-year flood zone). The City of Inglewood is designated a Non-Special Flood Hazard Area and is considered by the NFIP to have a low to medium probability of flooding. Historically, Inglewood has experienced no flood events (City, 2010). In addition, the City of Inglewood is not located within a dam inundation area (City 2010, Appendix D Map 2) and is not at risk of flooding due to failure of a dam or levee.

f. Seiche, Tsunami, and Mudflow Potential

Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. The City of Inglewood does not contain any large water bodies that could be at risk related to seiche. Thus, hazard risks related to seiche do not exist within the City.

A tsunami is a series of ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. The City of Inglewood is not located adjacent to the Pacific Ocean, is not within a tsunami zone (City 2010, Appendix D Map 6) (Cal EMA, 2016) and is not at risk of flooding due to a tsunami.

A mudflow is a landslide composed of saturated rock debris and soil with a consistency of wet cement. As described in Section 4.L, Geology and Soils, the TOD Plan area has a relatively flat topography. According to the City's Multi-Hazard Mitigation Plan (March 23, 2010) there are no hillsides within the City that could experience mudflow (City 2010, Appendix D Map 4).

3.12.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of identified impacts on hydrology and water quality. Appendix G of the CEQA Guidelines indicates that a project would have a significant effect on the environment if it were to:

Threshold HWQ-1 Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;

Threshold HWQ-2 Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;

Threshold HWQ-3 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i. Result in substantial erosion or siltation on- or off-site,
- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;

Threshold HWQ-4 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or

Threshold HWQ-5 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

3.12.5 IMPACTS AND MITIGATION MEASURES

Threshold HWQ-1: Violate any water quality standards or waste discharge requirements.

Impact HWQ-1.1: Site grading and construction activities would result in short-term increases in the transport of silt and sediment, along with hydrocarbon-based pollutants, to receiving waters. Site construction activities would also allow for infiltration of hydrocarbon and other pollutant discharges into the groundwater. However, compliance with National Pollutant Discharge Elimination System (NPDES) requirements, as well as implementation of a Stormwater Pollution Prevention Plan (SWPPP), including Best Management Practices (BMPs), would avoid the potential to violate any water quality standards or waste discharge requirements. The impact would therefore be *less than significant*.

Methodology

A project's impacts on water quality generally occur during three phases of site-specific development: (1) site preparation, earthwork, and construction, when the potential for erosion, siltation, and sedimentation is the greatest; (2) following construction, prior to the establishment of ground cover, when erosion potential remains relatively high; and (3) following completion

of site-specific development, when impacts related to erosion and sedimentation decrease markedly, but those associated with urban runoff and waste discharges increase. Impact HWQ-1.1 addresses the first two of these three periods, while the third period, ongoing operations, is addressed in Impact HWQ-1.2.

The analysis of water quality impacts is based on a review of published information and reports regarding regional hydrology, groundwater conditions, and surface water quality. Data sources include the LA RWQCB Water Quality Control Plan (LA RWQCB, 2015), California Department of Water Resources watershed and groundwater basin information (DWR, 2004), County of Los Angeles Ballona Creek Watershed Management (County, 2016), and other databases and reports as referenced. Components of the proposed TOD Plans that would have the benefit of reducing urban runoff are considered, and the analysis also takes into consideration mandatory compliance with applicable federal, state, and local regulations addressing water quality and urban runoff.

The potential for impacts in relation to water quality standards and waste discharge requirements was evaluated by considering the general type of pollutants that site-specific development and infrastructure projects permitted by the proposed TOD Plans would generate during construction. In determining the level of significance, the analysis recognizes that site-specific development and infrastructure projects permitted by the proposed TOD Plans would be required to comply with relevant federal, state, regional, and local laws and regulations that are designed to ensure compliance with applicable water quality standards and waste discharge requirements. These laws and regulations have been developed to reduce the potential for pollutants in receiving waters (as described in Section 3.12.2 above).

Because the regional and local regulations related to water quality standards have been developed to reduce the potential of pollutants in the water resources (as described in the Plans, Policies, and Regulations Section above), and are implemented to specific waterbodies, such as 303D TMDL requirements, or specific development projects, such as grading and construction permit regulations that meet the MS4 requirements, potential violation of water quality standards or waste discharge requirements would occur if site-specific development and infrastructure projects permitted by the TOD Plans would not implement the existing requirements. Conversely, implementation of all relevant water quality requirements would ensure that an exceedance of water quality standards would not occur and that impacts would be less than significant.

Impact Assessment

The TOD Plans provide for infill development that may involve demolition of some existing structures, site preparation, construction of new buildings, and infrastructure improvements. Demolition of existing structures, removal of existing pavement and concrete replacement,

grading, stockpiling of materials, excavation and the import/export of soil and building materials, construction of new structures, and landscaping activities would expose and loosen sediment and building materials, which have the potential to mix with stormwater and urban runoff and degrade surface and receiving water quality.

Additionally, construction generally requires the use of heavy equipment and construction-related materials and chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents, and paints. In the absence of proper controls, these potentially harmful materials could be accidentally spilled or improperly disposed of during construction activities and could wash into and pollute surface waters or groundwater, resulting in a substantial negative effect on water quality.

Pollutants of concern during construction activities generally include sediments (erosion), trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction, which would have the potential to be transported via storm runoff into nearby receiving waters and eventually may affect surface or groundwater quality. During construction activities, excavated soil would be exposed thereby increasing the potential for soil erosion and sedimentation to occur compared to existing conditions. In addition, during construction, vehicles and equipment are prone to tracking soil and/or spoil from work areas to paved roadways, which is another form of erosion that could affect water quality.

Each future site-specific development project that would be permitted by the proposed TOD Plans would be required to comply with applicable regulations to obtain demolition, excavation, grading, construction, and other permits from the City. The City's permitting processes would ensure that each site-specific development and infrastructure project is undertaken in compliance with applicable NPDES requirements. In order to control the impact of erosion, sedimentation, and other pollutants on receiving waters, the SWRCB Construction General Permit (that would be implemented through the City's permitting process), requires the implementation of BMPs to eliminate or reduce the discharge of pollutants in stormwater discharges, and prohibits the discharge of non-storm water from construction sites as these non-storm water discharges are likely to carry pollutants to receiving waters.

Under the Construction General Permit, site-specific development and infrastructure projects within the TOD Plan areas would be required to prepare a SWPPP and implement construction BMPs detailed in the SWPPP during construction activities, including the minimum BMPs listed in **Table 3.12-1** and the BMPs listed in **Table 3.12-2** if more than one-acre of land would be disturbed as part of site construction. Construction BMPs would be applied as needed for site-specific development or infrastructure project (and enforced by permitting from the City) to

minimize erosion and sedimentation and to prevent spills. Various BMPs may be needed at different times during construction since activities are constantly changing site conditions. Selection of erosion control BMPs is based on minimizing disturbed areas, stabilizing disturbed areas, and protecting water quality. Selection of sediment control BMPs is based on retaining sediment onsite and controlling the site perimeter. In addition, SWPPPs will identify requirements for the following: equipment storage, cleaning and maintenance areas/ activities; points of ingress and egress to the construction site; material loading, unloading, and storage practices and areas, including construction materials, building materials and waste materials; and materials, equipment, or vehicles that may come in contact with stormwater.

Compliance with the Construction General Permit, which would include implementation of BMPs that are designed, implemented, and maintained to address pollutants of concern, as required by the provisions of the Construction General Permit, would be required through the City's demolition, construction, grading, and excavation permitting process and would provide that no adverse water quality impacts would occur during construction of site-specific development and infrastructure projects permitted by the proposed TOD Plans. In addition, a Notice of Construction would be required to be submitted to the LA RWQCB at least 30 days prior to the start of each site-specific project's construction activities, which includes preparation and implementation of a SWPPP. A Notice of Construction Completion would be required to be submitted to LA RWQCB upon completion of construction and stabilization of the development sites.

Significance Conclusion for Impact HWQ-1.1

Each future site-specific development and infrastructure project permitted by the proposed TOD Plans would be required to comply with applicable regulations to obtain demolition, excavation, grading, construction, and other permits from the City. The City's permitting processes would ensure that each site-specific development and infrastructure project is undertaken in compliance with applicable NPDES requirements. Under the Construction General Permit, site-specific projects within the TOD Plan areas would be required to prepare a SWPPP and implement construction BMPs detailed in the SWPPP during construction activities, including the minimum BMPs listed in **Table 3.12-1** and the BMPs listed in **Table 3.12-2** if more than one-acre of land would be disturbed as part of site construction.

As a result of compliance with the Construction General Permit and specific BMPs that are required for each site-specific construction project, construction impacts related to water quality standards or waste discharge requirements from site-specific development and infrastructure projects permitted by the proposed TOD Plan would be less than significant.

Threshold HWQ-1: Violate any water quality standards or waste discharge requirements.

Impact HWQ-1.2: Following completion of grading and construction activities, urban runoff and waste discharges from streets, parking lots, and other paved areas, as well as runoff from landscaped areas, would carry a variety of pollutants to receiving waters. However, implementation of Best Management Practices (BMPs) as required to be set forth in the County's MS4 Permit would avoid the potential to violate any water quality standards or waste discharge requirements during ongoing operations. The impact would therefore be *less than significant*.

Methodology

The potential for impacts in relation to water quality standards and waste discharge requirements was evaluated by considering the general type of pollutants that site-specific development and infrastructure projects permitted by the proposed TOD Plans would generate during ongoing operations. In determining the level of significance, the analysis recognizes that site-specific development and infrastructure projects permitted by the proposed TOD Plans would be required to comply with relevant federal, state, and regional laws and regulations that are designed to ensure that applicable water quality standards and waste discharge requirements are met.

A violation of water quality standards or waste discharge requirements would occur if site-specific development and infrastructure projects permitted by the TOD Plans would not implement or would be inconsistent with existing regulatory requirements designed to protect water quality and prevent erosion and sedimentation during operations. Thus, a significant water quality impact could occur if increased runoff generated by the new development is not properly detained and treated for specified pollutants before being released into the downstream drainage system. Conversely, implementation of all relevant water quality requirements, including proper on-site detention and treatment for specified pollutants, would ensure that impacts related to an exceedance of water quality standards would not occur and that impacts would be less than significant.

Impact Assessment

Urban Runoff

Intensification of land uses proposed by the Westchester/Veterans and Crenshaw/Imperial TOD Plans could introduce new or additional pollutants to receiving waters.

Sedimentation would not be considered a potential environmental effect post-construction because development sites would be paved, covered with buildings, or landscaped, which would stabilize soils for the long term. Site-specific development projects permitted by the TOD Plans would result in greater vehicular use of new and existing nearby roadways, which would lead to the increased accumulation and release of petroleum hydrocarbons, lubricants, sediments, and metals (generated by the wear of automobile parts). The management of landscaped areas within new development sites would result in runoff and/or infiltration of herbicides and pesticides. These types of common urban pollutants would be transported in runoff, adversely affecting the quality of receiving waters and groundwater. Therefore, post-construction, nonpoint source pollutants would be the primary contributors to potential water quality degradation. Nonpoint source pollutants would be washed by rainwater from rooftops and landscaped areas into on-site and local drainage networks. Potential nonpoint source pollutants include products used in landscaping (e.g., pesticides, herbicides, and fertilizers); oil, grease, gasoline, heavy metals (nickel, copper, zinc, cadmium, and lead), and trash from roads and parking areas; and petroleum hydrocarbons from fuels. Roof runoff can also contribute zinc if galvanized rain gutters are provided.

Pollutants of Concern

Table 3.12-2 reflects anticipated pollutants of concern that would be generated by site-specific developments permitted by the proposed TOD Plans.

TABLE 3.12-2: POLLUTANTS OF CONCERN

Pollutant	Expected from TOD Plans?	Additional Information and Comments
Suspended-Solid/ Sediment	Yes	Potential sources of sediment include existing landscaping areas and disturbed earth surfaces.
Nutrients	Yes	Potential sources of nutrients include fertilizers, sediment, and trash/debris.
Heavy Metals	Yes	Potential sources of heavy metals include streets, as well as commercial and multi-family parking areas.
Pathogens (Bacteria/Virus)	Yes	Potential sources of pathogens include pets, food wastes, and landscaping/sediment areas.
Pesticides	Yes	Potential sources of pesticides include landscaping and open space areas.
Oil and Grease	Yes	Potential sources of oil and grease include streets and parked vehicles.
Toxic Organic Compounds	No	Toxic organic compounds are not expected to be of concern due to the predominance of residential, commercial, and office uses in new development.
Trash and Debris	Yes	Potential sources include common litter and trash cans from homes.

Significance Conclusion for Impact HWQ-1.2

The Los Angeles County MS4 Permit requires the design and implementation of specific post-construction controls to mitigate storm water pollution, prior to site-specific project completion. During operation of new development or redevelopment, the MS4 permit prohibits non-storm water discharges from the development (with some conditional exceptions) and requires BMPs be implemented. Storm water effluent must meet water-quality based effluent limitations, or water quality standards for discharge leaving the site, and must not cause or contribute to the exceedance of receiving water limitations (water quality standards for receiving waters).

Implementation of MS4 Permit requirements will:

- Lessen the water quality impacts of development by using smart growth practices; and
- Minimize the adverse impacts from storm water runoff on the biological integrity of Natural Drainage Systems and the beneficial uses of water bodies in accordance with requirements under CEQA (Cal. Pub. Resources Code Section 21000 et seq.).

Based on the provisions of the County's MS4 permit, it is concluded that site-specific drainage improvements and BMPs would adequately protect downstream water quality in accordance with local, state, and federal water quality requirements. Therefore, impacts would be less than significant.

Threshold HWQ-2: Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

Impact HWQ-2: Site-specific development projects permitted by the proposed TOD Plans would increase the amount of pervious landscaped surface areas and resulting groundwater infiltration, which would be an improvement in groundwater conditions due to landscaping requirements for new development. Thus, development permitted by the TOD Plans would not result in an increase in impervious surface area such that the infiltration of surface water to groundwater would be reduced. Impacts related groundwater recharge and sustainable groundwater management would be *less than significant*.

Methodology

The following groundwater supply analysis is based on a review of published information and reports regarding regional hydrology, geology, and groundwater conditions. Data sources include the 2015 Urban Water Management Plan (City, 2016), Water Replenishment District of Southern California Watermaster Service Report for the West Coast Basin (WRD, 2018), and

other databases and reports as referenced. Components of the proposed TOD Plans that would have the benefit of increasing infiltration are considered, along with implementation of applicable federal, state, and local regulations related to groundwater and the West Coast Groundwater Basin.

The analysis of impacts to groundwater considers changes in groundwater recharge due to increases in impervious surfaces, increase in water demand, and the condition of the groundwater basin.

Impacts are considered significant if the TOD Plans would result in a depletion of groundwater supplies or interfere with groundwater recharge such that there would be a lowering of the groundwater levels. In determining the level of significance, the analysis recognizes that all development that would be permitted by the proposed TOD Plans would be required to comply with the requirements of the West Coast Groundwater Basin adjudication, which is designed to prevent depletion of the Basin.

Impact Assessment

As described above, the West Coast Groundwater Basin is adjudicated, which limits the allowable annual extraction of groundwater per water rights holder, including the City of Inglewood. Groundwater levels are managed by the California Department of Water Resources to maintain a safe operating yield of groundwater, which is a sustainable pumping rate that does not exceed the total recharge into the basin.

The City of Inglewood has traditionally pumped less than its adjudicated share of 4,449.89 acre-feet of groundwater annually. The City's 2015 Urban Water Management Plan reports that between 2008 and 2015, an annual average of 2,657 acre-feet of groundwater was pumped from the West Coast Groundwater Basin accounting for 24.5 percent of the City's water supply. During that period, imported water supplies accounted for an annual average of 7,437 acre-feet (69.0 percent), while recycled water supplies accounted for an annual average of 694 acre-feet (6.5 percent).

Because the City traditionally pumps less than its adjudicated share of groundwater in the West Coast Basin, Inglewood has had a net positive effect on groundwater supplies. For example, in the 2016-2017 water year, because of previous year carry-over of water supplies, the City was able to leave a balance of 6,364.21 acre-feet of water unused (WRD, 2018). Per the provisions of the adjudication, the City was permitted to carry over 4,449.89 acre-feet of groundwater to the next water year, leaving a surplus of 1,914.32 acre-feet of water in the groundwater basin.

As a result of the existing groundwater basin adjudication and the City's traditional use of groundwater, a safe operating yield for the Basin is maintained. By limiting the allowable

extraction of groundwater, the adjudication prohibits the City from pumping any water that could result in a lowering of the groundwater level or depletion of groundwater supplies.

In addition, the TOD Plans involve infill development and redevelopment within an existing urban area with mainly impervious surfaces, including buildings, roadways, sidewalks, and parking lots. Since the existing TOD Plan areas are currently made up of primarily impervious surfaces, the proposed TOD Plans would result in a net decrease in impervious surfaces and increased infiltration of stormwater into the groundwater basin by introducing trees and landscaped areas as part of streetscape improvements and Green Boulevard programs.

Significance Conclusion for Impact HWQ-2

Site-specific development projects permitted by the proposed TOD Plans would increase the amount of pervious landscaped surface areas and resulting groundwater infiltration, which would be an improvement in groundwater conditions due to landscaping requirements for new development. Thus, development permitted by the TOD Plans would not result in an increase in impervious surface area such that the infiltration of surface water to groundwater would be reduced. Impacts related groundwater recharge and sustainable groundwater management would be less than significant.

Threshold HWQ-3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would (i) result in substantial erosion or siltation on- or off-site, (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, or (iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Impact HWQ-3.1: Neither the Westchester/Veterans nor the Crenshaw/Imperial TOD Plan would alter existing drainage patterns. Site-specific development permitted by the TOD Plans would be required to implement all applicable construction regulations and BMPs, minimizing the potential for substantial erosion or siltation during construction. However, providing new landscaping within site-specific development projects and along Green Streets could result in patches of exposed soil immediately following landscape installation until groundcover becomes established with a moderate to high potential for erosion. Implementation of Mitigation Measure HWQ-3.1 would prevent

landscape installations from creating temporary erosion hazards following initial installation until groundcover is established. Thus, impacts would be *significant but mitigable*.

Methodology

A project's impacts on water quality generally occur during three periods: (1) the earthwork and construction phase of site development, when the potential for erosion and siltation is the greatest; (2) following construction, prior to the establishment of ground cover, when erosion potential remains relatively moderate to high; and (3) following completion of future development, when impacts related to erosion and sedimentation decrease markedly, but those associated with urban runoff and waste discharges increase. Thus, Impact HWQ-3.1, which addresses erosion and siltation focuses on time starting with site-specific earthwork and site development through the completion of construction and establishment of ground cover.

The analysis of Impact HWQ-3.1 recognizes that a series of applicable federal, state, regional, and local laws and regulations, as well as waste discharge requirements have been adopted to require implementation of best management practices and to minimize the potential for pollutants in receiving waters from these sources and ensure that applicable water quality standards are met. Thus, implementation of best management practices and compliance with applicable federal, state, regional, and local laws and regulations, as well as waste discharge requirements would ensure that applicable water quality standards are met. Failure to implement best management practices or comply with applicable federal, state, regional, and local laws and regulations, as well as waste discharge requirements would therefore be indicative of a significant impact.

Impact Assessment

Construction

The TOD Plan areas are within a fully developed urban setting through which no surface streams or rivers currently pass. Stormwater run-off currently sheet flows across impervious surfaces and is collected in street curbs and gutters, and then conveyed to storm drains. Construction of future site-specific development and infrastructure projects permitted by the proposed TOD Plans would require demolition of some existing structures and removal of existing parking areas and landscaping, along with development of new uses. These activities would expose and loosen soils, which has the potential to result in erosion and the loss of topsoil. Because the TOD Plan areas are flat and do not contain substantial slopes, the large majority of soil disturbance for future site-specific development within the TOD areas would be related to excavation and backfill for installation of building foundations and underground utilities, as well as site grading to provide proper drainage.

The existing NPDES Construction General Permit requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) by a Qualified SWPPP Developer for construction sites that would disturb over one-acre of ground surface. The Qualified SWPPP Developer-prepared SWPPP is required to address site-specific conditions related to construction, and would identify potential sources of sedimentation during construction, and would describe the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern. Common types of construction BMPs are listed in **Tables 3.12-1** and **3.12-2**. In addition, a Qualified SWPPP Practitioner is required to ensure compliance with the SWPPP through regular monitoring and visual inspections during construction activities. The SWPPPs would be amended and BMPs revised, as determined necessary through field inspections, to protect against substantial soil erosion, the loss of topsoil, or alteration of the drainage pattern. Compliance with the Construction General Permit and a SWPPP prepared by a Qualified SWPPP Developer and implemented by a Qualified SWPPP Practitioner would prevent construction-related impacts related to potential alteration of a drainage pattern or erosion from site-specific development and infrastructure projects permitted within the proposed TOD Plan areas that could result in flooding.

Operations

Although the TOD Plans would not alter existing drainage patterns or increase impervious surface area, newly landscaped areas within site-specific development projects and along Green Streets would continue to have a moderate to high potential for erosion and siltation until groundcover becomes established.

Significance Conclusion for Impact HWQ-3.1

The TOD Plans would not result in alterations to existing drainage patterns. In addition, compliance with existing construction regulations including implementation of BMPs during construction, impacts related to erosion and siltation would be less than significant. However, providing new landscaping within site-specific development projects and along Green Streets could result in patches of bare ground immediately following landscape installation until groundcover becomes established. These patches of bare ground would have a moderate to high potential for erosion. The result would be a temporary, but significant impact requiring mitigation.

Mitigation Measures

Mitigation Measure HWQ-3.1: All portions of landscaping installed as part of site-specific development projects, Green Streets, open space, or infrastructure projects shall be designed to prevent erosion

and not result in temporary patches of exposed soil following installation prior to establishment of ground cover.

Significance Conclusion with Implementation of Mitigation Measures

Mitigation Measure HWQ-3.1 would prevent the occurrence of patches of exposed soil following installation prior to establishment of ground cover within landscaping installed as part of site-specific development projects, Green Streets, open space, or infrastructure projects. Thus, new landscaping within the TOD Plan areas would be designed to prevent erosion following construction. Impact 3.1 would therefore be reduced to less than significant.

Threshold HWQ-3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would (i) result in substantial erosion or siltation on- or off-site, (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, or (iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Impact HWQ-3.2: Neither the Westchester/Veterans nor the Crenshaw/Imperial TOD Plan would alter existing drainage patterns. The TOD Plans would increase the amount of pervious surface area within the TOD Plan areas through requirements for landscaping and a Green Streets program. Site-specific development projects would be required to detain water onsite or drain into storm drains with capacity to accept such drainage. Thus, the TOD Plans would not increase the rate or amount of surface runoff or result in on- or off-site flooding. Impacts would therefore be *less than significant*.

Methodology

A significant impact would result if the TOD Plans were to alter drainage patterns or increase the pervious surface area within the Plan areas so as to exceed the capacity of existing drainage systems and cause flooding, either on- or off-site. The analysis first determines whether drainage patterns would be altered or runoff from development permitted by the TOD Plans would increase. Should the TOD Plans cause drainage patterns to be altered or runoff from new development to increase, analysis would be undertaken to determine whether the capacity of area drainage systems would be exceeded so as to cause on- or off-site flooding.

Impact Assessment

Future site-specific development projects that would be permitted by the TOD Plans consist of residential, retail, and employment-generating development that would existing buildings, structures, and other impervious surfaces. The TOD Plan provides for d site-specific development projects to retain and infiltrate stormwater pursuant to the County's SUSMP requirements and ensure that no net increase in runoff would occur.

Additionally, the TOD Plans include installation of landscaping as part of the proposed Green Boulevards Network within the TOD Plan areas. These landscaped areas would help to capture, retain, and utilize surface water runoff for irrigation, which would reduce the overall amount of surface runoff.

Significance Conclusion for Impact HWQ-3.2

No alteration of existing drainage pattern would result. By complying with applicable regulatory requirements and detaining runoff onsite within site-specific development projects, permitted development, there would be not net increase in peak runoff during storm events. In combination with increased landscape areas within site-specific developments and along Green Boulevard, the TOD Plans would result in a new decrease in runoff from the Plan areas. As a result, the potential for on- or off-site would be reduced and impacts would be less than significant.

Threshold HWQ-3.3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would (i) result in substantial erosion or siltation on- or off-site, (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, or (iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Impact HWQ-3.3: Site-specific development projects permitted by the proposed TOD Plans would introduce water quality pollutants during site grading, construction, and ongoing operations. Future site-specific development projects permitted by the proposed TOD Plans would be required to prepare a SWPPP and implement construction BMPs detailed in the SWPPP during construction, which are designed to protect water quality and thereby avoid significant impacts. With implementation of

Source Control and Treatment Control BMPs in accordance with the SUSMP standards and LID development standards, site-specific development projects permitted by the proposed TOD Plans would not result in a substantial degradation of water quality, and impacts would be *less than significant*.

Methodology

Impacts on water quality were evaluated by considering the general type of pollutants that future site-specific development permitted by the TOD Plans would generate during construction and operation and whether meeting the requirements of applicable regulations would reduce potential impacts to a less-than-significant level.

The analysis also takes into consideration mandatory compliance with applicable federal, state, and local regulations addressing water quality and urban runoff. In determining the level of significance, the analysis recognizes that site-specific development and infrastructure projects permitted by the proposed TOD Plans would be required to comply with relevant federal and state laws and regulations that are designed to ensure that water quality is not substantially degraded. Thus, implementation of all relevant water quality requirements would ensure that an exceedance of water quality standards would not occur.

Impact Assessment

Construction

The TOD Plans includes infill development would involve demolition of some existing structures and removal of existing pavement, site preparation and grading, construction of new buildings, stockpiling of materials, landscaping activities, and infrastructure improvements that could result in degradation of water quality.

However, as discussed for Impact HWQ-1.1, each future site-specific development project that would be permitted by the TOD Plans would be required to comply with applicable NPDES requirements to control pollutants and protect water quality during construction. The SWRCB Construction General Permit (that would be implemented through the City's permitting process), requires the implementation of BMPs to eliminate or reduce the discharge of pollutants in stormwater discharges, and prohibits the discharge of non-storm water from construction sites as these non-storm water discharges are likely to carry pollutants to receiving waters. Future site-specific development projects permitted by the proposed TOD Plans would be required to prepare a SWPPP and implement construction BMPs detailed in the SWPPP during construction, which are designed to protect water quality and thereby avoid significant impacts.

Operation

Intensification of land uses as proposed by the TOD Plans could introduce new or additional pollutants to the TOD Plan areas, such as sediments, trash, petroleum products, metals, and chemicals that could potentially discharge into surface waters by storm drains either directly or during storm water runoff events. Therefore, site-specific development projects permitted by the TOD Plans would be required to implement Source Control and Treatment Control BMPs to reduce the discharge of pollutants to the maximum extent practicable, in accordance with County SUSMP standards. Implementation of site-specific source control and treatment control BMPs in accordance with the SUSMP standards (such as those listed in **Tables 3.12-1 and 3.12-2**) would remove potential pollutants from runoff and would not contribute additional pollutant loads into receiving waters. Inglewood Municipal Code Section 10-208 requires LID standards to be implemented in each site-specific development project to reduce potential water quality impacts by using smart growth practices, and through stormwater infiltration, evapotranspiration, biofiltration, and rainfall harvest and use.

Significance Conclusion for Impact HWQ-3.3

Future site-specific development projects permitted by the proposed TOD Plans would be required to prepare a SWPPP and implement construction BMPs detailed in the SWPPP during construction, which are designed to protect water quality and thereby avoid significant impacts. With implementation of Source Control and Treatment Control BMPs in accordance with the SUSMP standards and LID development standards, site-specific development projects permitted by the proposed TOD Plans would not result in a substantial degradation of water quality, and impacts would be less than significant.

Threshold HWQ-4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

Impact HWQ-4: Neither the Westchester/Veterans, Crenshaw/Imperial TOD Plan areas, nor the City of Inglewood contain any lands (1) within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, or (2) any land areas subject to inundation due to seiche, tsunami, or mudflow. *No impact* would result.

Methodology

To determine whether a significant impact would result from the TOD Plans, it was first determined whether any portions of the TOD Plan areas were either (1) within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or

other flood hazard delineation map, or (2) subject to inundation due to seiche, tsunami, or mudflow.

Because the City of Inglewood and the TOD Plan areas do not include any land areas that are within a 100-year flood hazard area or at risk of a seiche, tsunami, or mudflow, the TOD Plans are not at risk of a release of pollutants in the event of a 100-year flood, seiche, tsunami, or mudflow. Thus, further analysis of the potential for release of pollutants due to flooding, tsunami, seiche, or mudflow was not necessary.

Impact Assessment

There are no lands designated as a Special Flood Hazard Area by FEMA under the National Flood Insurance Program (areas subject to a one percent chance or greater chance of flooding in any one year, 100-year flood zone) within the Inglewood. The City is thus designated a Non-Special Flood Hazard Area. It is considered by the National Flood Insurance Program to have a low to medium probability of flooding and historically has experienced no flood events (City 2010). As a result, site-specific development and infrastructure projects permitted by the TOD Plans would not result in a release of pollutants due to flooding in a 100-year flood hazard.

The City of Inglewood, including the TOD Plan areas, is not located adjacent to the Pacific Ocean and is not within a tsunami zone (City 2010, Appendix D Map 6) (Cal EMA, 2016) and is not at risk of flooding due to a tsunami. Therefore, site-specific development and infrastructure projects permitted by the TOD Plans would not result in a release of pollutants due to tsunami.

Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. The City of Inglewood, including the TOD Plan areas, does not contain any large water bodies that could be at risk related to seiche. As a result, site-specific development and infrastructure projects permitted by the TOD Plans would not result in a release of pollutants due to seiche.

As described in Section 3.14, *Geology and Soils*, the TOD Plan areas have a relatively flat topography. According to the City's Multi-Hazard Mitigation Plan (March 23, 2010) there are no hillsides within the City that could experience mudflow (City 2010, Appendix D Map 4). Thus, site-specific development and infrastructure projects permitted by the TOD Plans would not result in a release of pollutants due to mudflow would not occur.

Significance Conclusion for Impact HWQ-4

Neither the Westchester/Veterans nor Crenshaw/Imperial TOD Plan areas nor the City of Inglewood include any land areas within a 100-year flood zone or areas subject to inundation due to seiche, tsunami, or mudflow. No impacts would result.

Threshold HWQ-5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Impact HWQ-5: The use of construction equipment and other vehicles could result in spills of oil, grease, gasoline, brake fluid, antifreeze, or other vehicle-related fluids and pollutants that would adversely affect water quality. Following construction and occupancy of new residential, retail, and employment-generating uses permitted by the TOD Plans, runoff from site-specific development project sites would contain pollutants common in urban runoff, including metals, oils and grease, pesticides, herbicides, nutrients, pet waste, and garbage/litter.

New development within the TOD Plan areas would be required to comply with the NPDES General Construction Permit and Inglewood Municipal Code regulations, which would prevent the substantial degradation of water quality during and after construction of site-specific development projects permitted by the TOD Plans. Because these regulatory requirements are designed to ensure that water quality discharges do not violate State Water Resources Control Board objectives, the TOD Plans would not conflict with or obstruct implementation of a water quality control plan. In addition, West Coast Groundwater Basin, from which the City draws a portion of its overall water supply, has been adjudicated and is not subject to a sustainable groundwater management plan. Impacts would therefore be *less than significant*.

Methodology

A significant impact would result if site-specific development and infrastructure improvement projects permitted by the TOD Plans would fail to implement applicable water quality requirements, including Best Management Practices (BMPs). The analysis therefore focuses on whether such projects are, in fact committed, to implement applicable water quality requirements, including BMPs.

Impact Assessment

Construction

The use of construction equipment and other vehicles could result in spills of oil, grease, gasoline, brake fluid, antifreeze, or other vehicle-related fluids and pollutants. Improper

handling, storage, or disposal of fuels and materials or improper cleaning of machinery could result in accidental spills or discharges that could degrade water quality. In addition, the use of equipment and ground disturbing activities could increase erosion, in turn potentially increasing sediment discharged into storm water that could degrade water quality. Site-specific development and infrastructure improvements permitted by the TOD Plans would be required to comply with all regulations designed to reduce or eliminate construction-related water quality effects, including the NPDES General Construction Permit and the City's Municipal Code Section 10-208 (Low Impact Development Requirements).

Inglewood Municipal Code Section 10-208 also requires implementation of BMPs to minimize the potential for and effects from discharge (defined as any spill or release of substances) and pollutants (including metals, fuels, solvents, petroleum substances, and more) during construction activities for all contractors. If a spill were to occur, Municipal Code Section 10-208 also requires the contractor to notify the City and take action to contact the appropriate safety and clean-up crews to ensure that a prevention program is followed.

Operations

Following construction and occupancy of new residential, retail, and employment-generating uses permitted by the TOD Plans, runoff from site-specific development project sites would contain pollutants common in urban runoff, including metals, oils and grease, pesticides, herbicides, nutrients, pet waste, and garbage/litter. Without BMPs and periodic sweeping to remove these pollutants, the TOD Plans could conflict with the City's General Plan Storm Drains and Wastewater Policy 2 and could degrade the quality of receiving waters. However, through compliance with the LID Standards Manual, consistent with the requirements of the NPDES MS4 Permit, the site-specific development permitted by the TOD Plans would be required to reduce operational stormwater pollution to the maximum extent practicable and eliminate prohibited non-stormwater discharges as part of the Project drainage design.

New residential, retail, and employment-generating uses permitted by the TOD Plans would also be required to be designed to utilize a combination of biofiltration planters and biofiltration systems, including non-proprietary standard systems identified in the Los Angeles County LID Standards Manual or proprietary systems approved by the City of Inglewood to treat stormwater. Runoff would be directed from drainage areas to on-site biofiltration plants and bio-swales. The biofiltration systems are designed to capture site runoff from roof drains, treat the runoff through biological reactions within the planter soil media, and discharge at a rate intended to replicate pre-developed conditions. Site-specific development projects would be required to identify the BMPs to be implemented to ensure that water quality would not be degraded, and the violation of water quality or waste discharge objectives set by the SWRCB would not occur. City review would confirm that BMP implementation complies with all applicable local, state, and federal regulations.

The West Coast Groundwater Basin, from which the City draws a portion of its overall water supply has been adjudicated, establishing a limit on pumping of 64,468 acre-feet per year (AFY). The City of Inglewood's adjudicated share of water rights from the basin is 4,449 AFY and the Golden State Water Company's adjudicated share of water rights from the basin is 7,502 AFY. The West Coast Groundwater Basin is not subject to a sustainable groundwater management plan.

Significance Conclusion for Impact HWQ-5

New development within the TOD Plan areas would be required to comply with the NPDES General Construction Permit and Inglewood Municipal Code regulations, which would prevent the substantial degradation of water quality during and after construction of site-specific development projects permitted by the TOD Plans. Because these regulatory requirements are designed to ensure that water quality discharges do not violate State Water Resources Control Board objectives, the TOD Plans would not conflict with or obstruct implementation of a water quality control plan. In addition, West Coast Groundwater Basin, from which the City draws a portion of its overall water supply, has been adjudicated and is not subject to a sustainable groundwater management plan. Impacts would therefore be less than significant.

3.12.6 REFERENCES - HYDROLOGY AND WATER QUALITY

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3.13 GEOLOGY, SOILS, AND SEISMICITY

3.13.1 INTRODUCTION

a. Overview

This section addresses potential environmental effects of site-specific development and infrastructure projects permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans related to geology, soils, and seismicity. The impacts examined include risks related to geologic hazards such as earthquakes, landslides, liquefaction, and expansive soils, and impacts on the environment related to soil erosion and sedimentation.

b. Definitions

Earthquake is the result of a sudden release of energy in the earth's crust that creates seismic waves. Earthquakes are classified by their magnitude, which is a measure of the amount of energy released during an event. The seismicity or seismic activity of an area refers to the frequency, type, and size of earthquakes experienced over a period of time.

Erosion refers to the loosening and transportation of rock and soil debris by wind, rain, or running water.

Expansive Soils are soils containing water-absorbing minerals that expand as they take in water. These soils can damage buildings due to the force they exert as they expand.

Factor of Safety refers to the ratio of forces resisting movement to those causing movement. When a calculated factor of safety is less than 1.0, forces that make a slope susceptible to failure have exceeded those that tend to hold it in place.

Fault refers to a fracture in the earth's crust forming a boundary between rock masses that have shifted.

Fault, Active is defined by the State Mining and Geology Board as one that has had surface displacement within Holocene time (about the last 11,000 years).

Fault, Inactive is defined by the State Mining and Geology Board as one that has had not surface displacement since before the Quaternary period (more than 1,800,000 years ago).

Fault, Potentially Active is defined by the State Mining and Geology Board as one that has had surface displacement within Quaternary time (the last 1,800,000 years).

Fill refers to earth or any other substance or material, including pilings placed for the purposes of erecting structures thereon.

Fill Material refers to any material placed in an area to increase surface elevation.

Ground Failure includes mudslides, landslides, liquefaction, or the compaction of soils due to groundshaking from an earthquake.

Liquefaction is the phenomenon in which saturated granular soils temporarily lose their shear strength during periods of earthquake-induced strong groundshaking. The susceptibility of a site to liquefaction is a function of depth to density, water content of granular sediments, and the magnitude and frequency of earthquakes in the surrounding region. Saturated, unconsolidated silt, sand, and silty sand within 50 feet of the ground surface are most susceptible to liquefaction. Liquefaction-related phenomena may include lateral spreading, ground oscillation, loss of load bearing strength, subsidence, and buoyancy effects.

Paleontological Resources include any fossilized remains, traces, or imprints of organisms, preserved in or on the earth's crust, that are of paleontological interest and that provide information about the history of life on earth, except that the term does not include any materials associated with an archaeological resource or any cultural item defined as Native American human remains. Significant paleontological resources are defined as fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or important to define a particular time frame or geologic strata, or that add to an existing body of knowledge in specific areas, in local formations, or regionally.

Richter Scale is a scale used to quantify the energy released by an earthquake. The Richter scale is logarithmic, which means that an earthquake registering 5.0 on the Richter scale has a shaking amplitude 10 times that of an earthquake that registered 4.0, and thus corresponds to a release of energy 31.6 times that released by the lesser earthquake.

3.13.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

The proposed TOD Plans are subject to a range of federal, state, and local plans, policies, and regulations, which are described below.

a. Federal Plans, Policies, and Regulations

Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act was enacted in 1997 to “reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards and reduction program.” To accomplish this,

the Act established the National Earthquake Hazards Reduction Program, which provides for characterization and prediction of hazards and vulnerabilities, improvement of building codes and land use practices, risk reduction through post-earthquake investigations and education, development and improvement of design and construction techniques, improvement of mitigation capacity, and accelerated application of research results. This Act designated the Federal Emergency Management Agency (FEMA) as the lead agency of the program and assigns it several planning, coordinating, and reporting responsibilities. Programs under this Act provide building code requirements such as emergency evacuation responsibilities and seismic code standards such as those to which site-specific development and infrastructure projects permitted by the proposed TOD Plans would be required to adhere.

b. State Plans, Policies, and Regulations

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface fault rupture in structures used for human occupancy. The main purpose of the Act is to prevent the construction of buildings for human occupancy on top of the traces of active faults. It was passed into law following the February 1971 magnitude (M) 6.5 San Fernando (Sylmar) Earthquake that resulted in over \$500 million in property damage and 65 deaths. Although the Act addresses the hazards associated with surface fault rupture, it does not address other earthquake-related hazards, such as seismically induced groundshaking, liquefaction, or landslides.

This Act requires the State Geologist to establish regulatory zones, now referred to as Earthquake Fault Zones, around the mapped surface traces of active faults, and to publish appropriate maps that depict these zones. Earthquake Fault Zone maps are publicly available and distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. The Act requires local agencies to regulate development within Earthquake Fault Zones. Before a development project can be permitted within an Earthquake Fault Zone, a geologic investigation is required to demonstrate that proposed buildings would not be constructed across active faults. A site-specific evaluation and written report must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back a minimum of 50 feet from the fault.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act, which was passed by the California legislature in 1990, addresses earthquake hazards related to liquefaction and seismically induced landslides. Under the act, seismic hazard zones are mapped by the State Geologist in order to assist local

governments in land use planning. The Act states that “it is necessary to identify and map seismic hazard zones in order for cities and counties to adequately prepare the safety element of their general plans and to encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety.” Public Resources Code Section 2697(a) states that “cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard.”

California Building Code

The California Building Code (CBC) is included in Title 24 of the California Code of Regulations. The CBC incorporates the International Building Code, a model building code adopted across the United States. Current state law requires every city, county, and other local public agency enforcing building regulations to adopt the provisions of the CBC within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission. The most recent version of the CBC was published as of July 1, 2016. The effective date of the 2016 Code is January 1, 2017.

The current CBC was adopted by the City of Inglewood and is included as Chapter 11 of the City’s Municipal Code. The code provides standards to protect property and public safety. It regulates the design and construction of excavations, foundations, building frames, retaining walls, and other building elements, and thereby mitigate the effects of seismic shaking and adverse soil conditions. The code also regulates grading activities, including drainage and erosion control.

California Construction General Permit

The State of California adopted a Statewide National Pollutant Discharge Elimination System (NPDES) Permit for General Construction Activity (Construction General Permit) on September 2, 2009 (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The last Construction General Permit amendment became effective on February 16, 2012. The Construction General Permit regulates construction site storm water management. Dischargers whose projects disturb 1 or more acres of soil, or whose projects disturb less than 1 acre but are part of a larger common plan of development that in total disturbs 1 or more acres, are required to obtain coverage under the Construction General Permit for discharges of storm water associated with construction activity.

To obtain coverage under this permit, project operators must electronically file Permit Registration Documents, which include a Notice of Intent, a Storm Water Pollution Prevention Plan (SWPPP), and other compliance-related documents, including a risk-level assessment for construction sites, an active stormwater effluent monitoring and reporting program during

construction, rain event action plans, and numeric action levels (NALs) for pH and turbidity, as well as requirements for qualified professionals to prepare and implement the plan.

The Construction General Permit requires the SWPPP to identify best management practices (BMPs) that will be implemented to reduce soil erosion. Types of BMPs include preservation of vegetation and sediment control (e.g., fiber rolls).

c. Local Plans, Policies, and Regulations

City of Inglewood General Plan Safety Element

Relevant policies of the City' General Plan Safety Element include the following:

1. Provide Measures to reduce seismic impacts.
 - Ensure that all potentially hazardous buildings are reinforced or demolished.
 - Restrict new structures for human occupancy from being constructed across active faults.
 - Require geological and soils engineering investigations in high-risk fault areas.
2. Promote public safety as it relates to the various modes of transportation.

City of Inglewood Municipal Code

Municipal Code Chapter 11, Article 2, Sections 11-2 through 11-5, California Building Code

The Inglewood Municipal Code incorporates the California Building Code in Chapter 11, Sections 11-2 through 11-5. These ordinances reference applicable standards and documentation requirements found in the California Building Code that address seismic safety.

Municipal Code Chapter 11, Article 13, Sections 11-130, Earthquake Hazard Reduction in Existing Buildings

This article of the City's Municipal Code promotes public safety and welfare by reducing the risk of death or injury that may result from the effects of earthquakes on unreinforced masonry-bearing-wall buildings constructed prior to 1934 or any unreinforced masonry building located in the City of Inglewood. This municipal code sets forth the minimum standards for structural seismic resistance established primarily to reduce the risk of life loss or injury and provides systematic procedures and standards for identification and classification of unreinforced masonry-bearing-wall buildings based on their present use. Priorities, time periods and standards are also established under which these buildings are required to be structurally analyzed and anchored. Where the analysis finds deficiencies, this code requires the building to be strengthened or demolished. In addition, qualified historical buildings are required to

comply with the State Historical Building Code per Part 8, Title 4 of the California Administrative Code.

3.13.3 ENVIRONMENTAL SETTING

a. Regional Geology

The City of Inglewood is located at the southern edge of the Transverse Ranges geomorphic province, which includes the San Gabriel and San Bernardino mountains to the northeast, and the Santa Monica Mountains to the north. The City is also located near the northern boundary of the Peninsular Ranges geomorphic province, which includes the San Jacinto and Santa Rosa mountains and Newport-Inglewood Fault and the Whittier-Elsinore Fault to the east and southeast (City, 2006).

Most of the City is underlain by thick (10,000 to 12,000 foot) Tertiary and Quaternary marine and continental sedimentary rocks. The Tertiary rocks, consisting primarily of sandstone, siltstone, and shale, are almost entirely of marine origin and range in age from Eocene to Pliocene. The Quaternary rocks consist of shallow marine sandstone and siltstone as well as continental siltstone, mudstone, and gravel (City, 2006).

b. Faults

The City of Inglewood contains both active and potentially active faults, several of which traverse near the TOD Plan areas. The Newport-Inglewood fault zone crosses the Downtown area east of the Westchester/Veterans TOD Plan area and is a zone of discontinuous folds and faults that stretch across the Los Angeles basin in a northwest-southeast direction from Beverly Hills to Newport Beach (City, 2006 and CDMG, 1986). The Potrero Fault, which is a major local component of the Newport-Inglewood fault, traverses northeast of the Crenshaw/Imperial TOD Plan area in a northwest-southeast direction (City, 2006 and CDMG, 1986). In addition, the Transverse faults consist of five northeast-southwest trending faults that include the Fairview, Centinela, Cemetery, Manchester, and Century faults. Three of these (Centinela, Cemetery, and Manchester) traverse east of the TOD planning areas (City, 1995).

In addition, several other active or potentially active faults are located in or nearby the City, as listed below.

- The San Andreas system runs parallel to the Newport-Inglewood fault to the east.
- The Townsite fault extends from its intersection with the Centinela Fault in the Centinela Creek, towards the southeast across the Hollywood Park racetrack to Century Boulevard.

- The Charnock and Overland faults trends northwest-southeast and lies just west of the City boundary (City, 2006 and CDMG, 1986).

Surface rupture or displacement occurs as a fault breaks the ground surface during a seismic event. Generally, this hazard is anticipated to occur along pre-existing faults. There has been no history of any major surface rupture on any of these fault zones (City, 2010).

San Andreas Fault Zone

The San Andreas Fault Zone runs northwest-southeast approximately 45 miles northeast of Inglewood and is the dominant active fault in California. Because the San Andreas Fault is the primary surface boundary between the Pacific and North American plates, it is thought to be capable of producing an M 8.0 to 8.5 earthquake. The last major earthquake on the Southern San Andreas Fault occurred in 1857 and registered M 8.0. The TOD Plan areas and the rest of Inglewood would experience strong groundshaking, which would result in damage to older structures, if and when a major episode occurs on this fault.

Newport-Inglewood Fault Zone

The Newport-Inglewood Fault Zone runs northwest-southeast from Beverly Hills through Inglewood, Long Beach, and Huntington Beach to Newport Beach. This fault zone is considered active. Historic earthquakes caused by movement in this fault zone include the Long Beach earthquake (March 10, 1933; M 6.3), the Signal Hill earthquake (October 2, 1933; M 5.0), and the Gardena earthquake (November 14, 1941; M 5.5).

c. Seismic Hazards

Surface Rupture

Surface rupture or displacement occurs as a fault breaks the ground surface during an earthquake. Generally, this hazard occurs along known, pre-existing faults. Because surface rupture cannot be prevented, faults are identified in order to avoid construction over the surface trace of potentially hazardous faults. Buildings typically collapse or suffer significant damage as a result of differential movement through a foundation. No know active or potentially active faults traverse the TOD Plan areas. Thus, surface fault rupture would not be an issue for the TOD Plans.

Groundshaking

The City of Inglewood is located in a seismically active region of Southern California. Five moderate earthquakes greater than M 5.5 have occurred within the greater Los Angeles Basin in the last 80 years. These include the 1933 Long Beach earthquake, the 1971 San Fernando

earthquake, the 1987 Whittier narrows earthquake, the 1991 Sierra Madre earthquake, and the 1994 Northridge earthquake.

All of southern California is seismically active. Additionally, as a result of the existing faults within the City and the region, the TOD Plan areas are seismically active. Groundshaking is a major cause of structural damage from earthquakes. The amount of motion expected at a building site can vary from none to forceful depending upon the distance to the fault, the magnitude of the earthquake, and the local geology. Greater movement can be expected at sites located on poorly consolidated material such as alluvium located near the source of the earthquake epicenter or in response to an earthquake of great magnitude.

The City of Inglewood and the TOD Plan areas are underlain by two different types of alluvium soils, undifferentiated late Pleistocene alluvium (Qoa) that is composed of well consolidated and cemented gravel, sand, silt, and clay; and late Holocene alluvium (Qya₂) that is composed of unconsolidated and uncemented gravel, sand, silt, and clay. Both of these soil types generally provide poor resistance to groundshaking (City, 1995).

d. Liquefaction Potential

Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similar to a fluid when subject to high intensity groundshaking. Liquefaction occurs when three general conditions co-exist: (a) shallow groundwater, (b) low-density non-cohesive (granular) soils, and (c) high-intensity ground motion. Studies indicate that saturated, loose, near-surface cohesionless soils exhibit the highest liquefaction potential, while dry, dense, cohesionless soils and cohesive soils exhibit low to negligible liquefaction potential. In general, cohesive soils are not considered susceptible to liquefaction. Effects of liquefaction on level ground include settlement, sand boils, and bearing capacity failures below structures. Dynamic settlement of dry loose sands can occur as the sand particles tend to settle and densify as a result of a seismic event.

Groundwater levels within the City vary greatly due to the existence of the faults, which act as a barrier to water movement (City, 1995). Within the TOD Plan areas, both the Newport-Inglewood fault and Potrero fault act as barriers to water movement and result in differences in groundwater levels (City 1995).

Possible liquefaction of the soils in the City has been significantly reduced due to water wells lowering the area's water table. Lands within the Westchester/Veterans TOD Plan area have been classified as having very low susceptibility, while lands within the Crenshaw/Imperial TOD Plan area have been classified as having low susceptibility to liquefaction.

e. Seismically Induced Ground Settlement

Seismically induced settlement results from the consolidation or compaction of loose sandy soils during earthquake shaking. The only portion of with the potential for seismically induced settlement is the course of the former Centinela Creek (City, 2006).

f. Seismically Induced Landslides

Landslides are the downhill movement of masses of earth and rock and are often associated with earthquakes; but other factors, such as the slope, moisture content of the soil, composition of the subsurface geology, heavy rains, and improper grading can influence the occurrence of landslides. The TOD Plan areas are relatively flat and do not contain slopes that might be subject to landslides.

g. Paleontological Resources

Paleontological resources include fossil remains, as well as fossil localities and rock or soil formations that have produced fossil material. Fossils are the remains or traces of prehistoric animals and plants. Fossils are important scientific and educational resources because of their use in (1) documenting the presence and evolutionary history of particular groups of now extinct organisms (2) reconstructing the environments in which these organisms lived, and (3) determining the relative ages of the strata in which they occur and of the geologic events that resulted in the deposition of the sediments that formed these strata and in their subsequent deformation.

Paleontological sensitivity is the potential for a particular geologic unit to produce scientifically important fossils. There is a direct correlation between fossils and the geologic units in which they are preserved; therefore, paleontological sensitivity is determined by rock type, the history of a particular geologic unit for producing significant fossils, and the recorded or known fossil localities derived from that unit.

Alluvial fan deposits from the Pleistocene epoch are considered to have high paleontological sensitivity because they are known to contain significant fossil resources. Pleistocene older alluvium in Los Angeles County and southern California has been reported to contain locally abundant and scientifically significant vertebrate, invertebrate, and plant fossils.

The TOD Plan areas are underlain by two different types of alluvium soils, undifferentiated late Pleistocene alluvium, and late Holocene alluvium. The Holocene deposits are generally considered too young to contain fossil resources. However, Pleistocene alluvial fan deposits, which exist in portions of the TOD Plan areas, exhibiting a composition conducive to the preservation of fossils may yield significant resources (City, 2006 and 2010 and Leighton, 2012).

3.13.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of cultural resources impacts. Appendix G of the CEQA Guidelines indicates that a project would have a significant effect if it were to:

- Threshold GEO-1** Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:
- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (Refer to Division of Mines and Geology Special Publication 42);
 - ii) Strong seismic groundshaking;
 - iii) Seismic-related ground failure, including liquefaction; and/or
 - iv) 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 proposed 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 risks to life or property; or
- 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 as defined in CEQA Guidelines Section 15064.5 (3);

3.13.5 IMPACTS AND MITIGATION MEASURES

Threshold GEO-1: Expose people or structures to risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic groundshaking, seismic-related ground failure, and/or landslides.

Impact GEO-1.1: *Fault rupture. Because there are no known active or potentially active faults within the TOD Plan areas, there would be no impact.*

Methodology

The analysis of impacts related to potential for fault rupture is based on a review of existing literature and previous studies within the City of Inglewood. The analysis considers the risk of loss, injury, or life involving rupture of a known earthquake fault that would result from the proposed TOD Plans increasing the number of people and buildings within the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas.

In determining whether a significant impact would result from the proposed TOD Plans, the analysis includes consideration of state law, including the Alquist-Priolo Earthquake Fault Zoning Act, which prohibits construction of structures for human occupancy astride an active fault. Any building designed for human occupancy that would not meet applicable seismic design standards would be considered to have a significant impact.

Impact Assessment

The City of Inglewood contains both active and potentially active faults, several of which traverse near, but not through the TOD Plan areas. Because there are no known active or potentially active faults within the TOD Plan areas, proposed development permitted by the TOD Plans would not increase the number of residents, employees, visitors, and structures exposed to potential of fault rupture in an earthquake.

Significance Conclusion for Impact GEO-1.1

Because there are no known active or potentially active faults within the TOD Plan areas, no impacts would result from the proposed TOD Plans.

Threshold GEO-1: Expose people or structures to risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic groundshaking, seismic-related ground failure, and/or landslides.

Impact GEO-1.2: *Strong seismic groundshaking.* Site-specific development projects permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would expose people and structures to strong seismic groundshaking. Because the TOD Plan areas are located in a seismically active region, some risk related to seismic groundshaking would remain, even with compliance with all applicable regulatory standards. However, all site-specific development projects that would be permitted by the TOD Plans would be required to conform to the seismic design parameters of the CBC and would be reviewed by the City as part of the building plan check and development review process. Compliance with the requirements of the CBC and Inglewood Municipal Code for structural safety would reduce hazards from strong seismic groundshaking to *less than significant*.

Methodology

The analysis of impacts related to risk of loss, injury, or life as the result of strong seismic groundshaking is based on a review of existing literature and previous studies within the City of Inglewood. The analysis considers the risk of loss, injury, or life due to strong seismic groundshaking that would result from the proposed TOD Plan increasing the number of people and buildings within Downtown Inglewood and Fairview Heights. Potential hazards to existing development within the TOD Plan areas is an existing condition and is therefore not considered to be an impact of the proposed TOD Plans.

In determining whether a significant impact would result from site-specific development and infrastructure projects permitted by the TOD Plans, the analysis includes consideration of the CBC, which sets standards for buildings to withstand seismic events. Existing state law and building codes provide for an adequate level of safety such that buildings built to code would withstand groundshaking forces of a minor earthquake without damage, of a moderate earthquake without structural damage, and of a major earthquake without collapse of the structure. In addition, critical facilities and structures (e.g., hospitals, emergency operations centers) built to code would remain standing and functional following an earthquake. Any building designed for human occupancy that would not meet applicable seismic design standards would be considered to have a significant impact.

Impact Assessment

Inglewood and the TOD Plan areas are located within a seismically active region. Site-specific development and infrastructure projects permitted by the proposed TOD Plans would add residents, employees, and new structures for human occupancy. Therefore, the TOD Plans would increase the number of people and structures subject to hazards from strong groundshaking. However, seismic groundshaking is a risk throughout Southern California, and seismic risks within the TOD Plan areas are typical of those throughout the region. In addition, because the proposed TOD Plans would result in the demolition and replacement of some older residential, retail, office, institutional, and industrial buildings with new structures designed to meet current seismic standards, the proposed TOD Plans would reduce the seismic groundshaking risk from these existing structures, and result in improved safety.

The TOD Plans provide for new structures for human occupancy to be constructed pursuant to applicable seismic design regulations at the time of construction. The CBC, as currently adopted in the Inglewood Municipal Code, includes provisions to reduce impacts caused by potential major structural failures or loss of life resulting from earthquakes or other geologic hazards. For example, the CBC requires that a California Certified Engineering Geologist or California-licensed civil engineer prepare a site-specific engineering analysis that demonstrates the satisfactory performance of proposed structures and contains requirements for design and construction of structures to resist loads and peak ground accelerations that could result from earthquakes. In addition, the City (through implementation of the CBC) requires that a site-specific soil engineering report be prepared to include appropriate subsurface exploration, laboratory testing and engineering analysis necessary to provide specific foundation, floor slab, and grading recommendations that include considerations for type of occupancy, and building structural system, and height that are required to be incorporated into grading plans and specifications as a condition of project approval.

Significance Conclusion for Impact GEO-1.2

All site-specific development projects that would be permitted by the TOD Plans would be required to conform to the seismic design parameters of the CBC and would be reviewed by the City as part of the building plan check and development review process. Because the TOD Plan areas are located in a seismically active region, some risk related to seismic groundshaking would remain, even with compliance with all applicable regulatory standards. However, compliance with the requirements of the CBC and Inglewood Municipal Code for structural safety would reduce hazards from strong seismic groundshaking to a less than significant level.

Threshold GEO-1: Expose people or structures to risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic groundshaking, seismic-related ground failure, and/or landslides.

Impact GEO-1.3: *Liquefaction and seismic-related ground failure. Site-specific development projects permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would not expose people and structures to liquefaction or seismic-related ground failure or landslides, including because such hazards are not present within the TOD Plan areas. No impact would result.*

Methodology

The analysis of impacts related to risk of loss, injury, or life as the result of seismic-related ground failure, including liquefaction, is based on a review of existing literature and previous studies within the City of Inglewood. The analysis considers the risk of loss, injury, or life due to seismic-related ground failure that would result from the proposed TOD Plans increasing the number of people and buildings within the Westchester/Veterans and Crenshaw/Imperial areas. Potential hazards to existing development within the TOD areas is an existing condition and is therefore not considered to be an impact of the proposed TOD Plans. In determining whether a significant impact would result from site-specific development and infrastructure projects permitted by the proposed TOD Plans, the analysis includes consideration of CBC requirements for new construction aimed at minimizing seismic-related ground failure, including liquefaction, to life and property.

Impact Assessment

Secondary effects of seismic shaking resulting from large earthquakes on the major faults in the Southern California region include seismically induced ground settlement of landslides, as well liquefaction. These secondary effects of seismic shaking are a possibility throughout the Southern California region and are dependent on the distance between the site and causative fault and the on-site geology.

Lands within the Westchester/Veterans TOD Plan area have been classified as having very low susceptibility to liquefaction, while lands within the Crenshaw/Imperial TOD Plan area have been classified as having low susceptibility to liquefaction. Liquefaction is therefore not an issue for the TOD Plan areas. The TOD Plan areas are also not subject to seismically induced ground settlement or landslides.

Significance Conclusion for Impact GEO-1.3

Because no lands within the TOD Plan areas are subject to liquefaction or seismically induced ground settlement or landslides, no impact would result.

Threshold GEO-1: *Expose people or structures to risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic groundshaking, seismic-related ground failure, and/or landslides.*

Impact GEO-1.4: *Landslides. Because the proposed Westchester/Veterans and Crenshaw/ Imperial TOD Plan areas are generally flat, the TOD Plans would not expose people or structures to risk of loss, injury, or life involving landslides. No impact would result.*

Methodology

The analysis of impacts related to risk of loss, injury, or life as the result of landslides is based on a review of existing literature and previous studies within the City of Inglewood. The analysis considers the risk of loss, injury, or life due to landslides that would result from the proposed TOD Plans permitting development adjacent to existing slopes and thereby increasing the number of people and buildings within the Westchester/Veterans and Crenshaw/Imperial areas potentially subject to landslide hazards. Because the TOD Pan areas are generally flat and do not contain any steep slopes, further investigation was unnecessary.

Impact Assessment

The TOD Plan areas are relatively flat and not subject to landslide potential. In addition, buildout of the proposed TOD Plans would not generate manufactured slopes in excess of three feet in height. As a result, the proposed TOD Plans would not expose people or structures to substantial adverse effects involving landslides, and impacts related to landslides would not occur.

Significance Conclusion for Impact GEO-1.4

Because the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plan areas are generally flat, the TOD Plans would not expose people or structures to risk of loss, injury, or life involving landslides. No impact would result.

Threshold GEO-2: Result in substantial soil erosion or the loss of topsoil.

Impact GEO-2: Site grading and construction activities associated with site-specific development projects permitted by the TOD Plans could result in short-term increases in the transport of silt and sediment to receiving waters. However, compliance with National Pollutant Discharge Elimination System (NPDES) requirements, as well as implementation of a Stormwater Pollution Prevention Plan (SWPPP), including best management practices (BMPs), would avoid substantial erosion or loss of topsoil. The resulting impact would therefore be *less than significant*.

Methodology

Erosion-related impacts are also addressed in detail in Section 3.12, *Hydrology and Water Quality*. As stated under **Impact HWQ-3**, in determining the level of significance, the analysis recognizes that site-specific development and infrastructure projects permitted by the proposed TOD Plans would be required to comply with relevant federal, state, and regional laws and regulations that are designed to reduce erosion and siltation during construction and ensure that applicable water quality standards and waste discharge requirements are met.

The analysis of impacts related to soil erosion and loss of topsoil is based on a review of existing literature and previous studies within the City of Inglewood. The analysis considers the types of (primarily construction) activities that would be permitted by the proposed TOD Plans that could result in soil erosion or loss of topsoil, such as clearing, grading, and site landscaping. Potential erosion hazards related to the few existing vacant parcels within the TOD Plan areas is an existing condition and is therefore not considered to be an impact of the proposed TOD Plans.

A significant impact related to erosion would occur if site-specific development and infrastructure projects permitted by the TOD Plans would not implement or would be inconsistent with existing regulatory requirements designed to prevent erosion and sedimentation during construction. Conversely, implementation of all relevant erosion control requirements would ensure that impacts would be less than significant.

Impact Assessment

The TOD Plan areas are developed and largely covered by impervious surfaces and landscaping. However, construction activities associated with site-specific development projects permitted by the TOD Plans that would disturb soil have the potential to contribute to soil erosion and the loss of topsoil. The proposed TOD Plan would permit demolition of some

existing structures and removal of existing parking areas and landscaping, along with development of new uses. These activities would expose and loosen soils, which has the potential to result in erosion and the loss of topsoil. Because the TOD Plan areas are flat and do not contain substantial slopes, the majority of soil disturbance for developments would generally be related to excavation and backfill for installation of building foundations and underground utilities, as well as site grading to provide proper drainage.

The existing NPDES Construction General Permit requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) by a Qualified SWPPP Developer for construction sites that would disturb over one-acre of ground surface. The Qualified SWPPP Developer-prepared SWPPP is required to address site-specific conditions related to construction. The SWPPP would identify the sources of potential sedimentation during construction, describe the implementation and maintenance of erosion control and sediment control best management practices (BMPs) to reduce or eliminate the transport of sediments. Common types of construction BMPs are described in Section 12, *Hydrology and Water Quality*. In addition, a Qualified SWPPP Practitioner is required to ensure compliance with the SWPPP through regular monitoring and visual inspections during construction activities. The SWPPPs would be amended and BMPs revised, as determined necessary through field inspections, to protect against substantial soil erosion or the loss of topsoil.

Significance Conclusion for Impact GEO-2

With compliance with the Construction General Permit and a SWPPP prepared by a Qualified SWPPP Developer and implemented by a Qualified SWPPP Practitioner, construction-related impacts from erosion and siltation from implementation of the proposed TOD Plan would be less than significant.

Before construction of any site-specific development project begins, the project applicant (or City for certain infrastructure projects) would be required to submit a notice of intent with the appropriate fees to the State Water Resources Control Board under the Construction General Permit.

In addition, the project applicant (or City for certain infrastructure projects) would be required to prepare a SWPPP, which would establish BMPs in order to reduce sedimentation and erosion. The site-specific development project would also incorporate all monitoring elements as required in the Construction General Permit. The project applicant (or City for certain infrastructure projects) would also develop an erosion and sediment control plan to be reviewed and approved by the City Chief Building Official prior to issuance of grading permit.

Implementation of the BMPs prescribed in the SWPPP that must be prepared for the proposed project would ensure that the construction-related impacts resulting from site grading would minimize the amount of silt and sediment that is transported to downstream locations.

BMPs that would be installed for the project include temporary storm water detention/desilting basins, silt fences, fiber rolls, and gravel bags, as appropriate, designed to retain storm flows on-site, slow surface runoff velocities, and provide pollutant/silt containment. Implementation of storm water detention/desilting basins would be designed to capture and temporarily hold peak storm flows prior to discharge to the storm drain system to provide for settlement of solids prior to discharge. The silt fences, fiber rolls, and gravel bags would also be used in appropriate locations approved by the City to direct and slow storm runoff and reduce sediment discharge.

As a result, impacts would be less than significant, and no mitigation measures would be required.

Threshold GEO-3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

Impact GEO-3: The Westchester/Veterans and Crenshaw/Imperial TOD Plans would permit redevelopment and new development on stable soils in areas that are not susceptible to landslides, lateral spreading, subsidence, liquefaction, or collapse. *No impact would therefore result.*

Methodology

The analysis of impacts related to risk of loss, injury, or life as the result of on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse is based on a review of existing literature and previous studies within the City of Inglewood. The analysis considers the risk of loss, injury, or life due to on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse that would result from the proposed TOD Plans increasing the number of people and buildings within the Westchester/Veterans and Crenshaw/Imperial areas. Potential hazards to existing development within the TOD Plan areas is an existing condition and is therefore not considered to be an impact of the proposed TOD Plan. In determining whether a significant impact would result from site-specific development projects permitted by the proposed TOD, the analysis includes consideration of CBC requirements for new construction aimed at minimizing hazards to life and property from landslide, lateral spreading, subsidence, liquefaction, or collapse.

Impact Assessment

Landslides

The TOD Plan areas encompass relatively flat areas, and do not include and are not located near any active landslide areas. In addition, buildout of the proposed TOD Plans would not generate any but small (<3') manufactured slopes. As a result, proposed development permitted by the TOD Plans would not be located on an unstable geologic or soil unit that could result in substantial adverse effects involving landslides.

Liquefaction

Lands within the Westchester/Veterans TOD Plan area have been classified as having very low susceptibility to liquefaction, while lands within the Crenshaw/Imperial TOD Plan area have been classified as having low susceptibility to liquefaction. Liquefaction is therefore not an issue for the TOD Plan areas.

Lateral Spreading

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope toward a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements, and such movement typically damages pipelines, utilities, bridges, and structures. Due to the lack of potential for liquefaction, lateral spreading is not anticipated within the TOD Plan areas.

Subsidence

There is no historic evidence of subsidence in Inglewood (City, 1995), and the City is limited to an annual allocation of groundwater pumping, which prevents over pumping and the potential or subsidence. In addition, the proposed TOD Plans do not involve extraction of oil or increased groundwater pumping from the adjudicated groundwater basin. Additional sources of water that may be needed by the City in the future would come from either imported or recycled sources (as described in Section 3.15, *Utilities, Service Systems and Water Supply*). As a result, no impacts related to subsidence would occur.

Significance Conclusion for Impact GEO-3

The proposed TOD Plan would result in redevelopment and new development within areas that are not susceptible to liquefaction, lateral spreading, collapse, or settlement. No impact would therefore result.

Threshold GEO-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

Impact GEO-4: The Westchester/Veterans and Crenshaw/Imperial TOD Plans would permit redevelopment and new development on soils expansive soils in some locations. However, compliance with the California Building Code would resolve expansive soil issues. The resulting impact would therefore be *less than significant*.

Methodology

The analysis of impacts related to risk of loss as the result of development on expansive soils is based on a review of existing literature and previous studies within the City of Inglewood. The analysis considers the risk of loss in relation to development on expansive soils that would result from development permitted by the proposed TOD Plans.

Potential hazards to existing development within the TOD areas is an existing condition and is therefore not considered to be an impact of the proposed TOD Plans. In determining whether a significant impact would result from site-specific development and infrastructure projects permitted by the proposed TOD Plans, the analysis includes consideration of CBC requirements for new construction aimed at minimizing hazards related to development in areas with expansive soils.

Impact Assessment

The TOD Plan areas include alluvial sediments that could be expansive, and the proposed TOD Plans could result in construction of buildings within areas underlain by expansive soils. However, the CBC as adopted in the City's Municipal Code, includes provisions to minimize hazards related to expansive soils. This includes requirements that a California Certified Engineering Geologist or California-licensed civil engineer prepare a site-specific soil engineering report based on appropriate subsurface exploration, laboratory testing and engineering analysis that sets forth specific foundation, floor slab, and grading recommendations to reduce potential impacts related to potential expansion and shrinkage of soils. The CBC requires these recommendations to be incorporated into grading plans and

buildings specifications, which the City will require as conditions of site-specific development approvals.

Significance Conclusion for Impact GEO-4

All proposed site-specific developments permitted by the TOD Plans would be required to conform to the provisions of the CBC, which will be reviewed by the City to ensure compliance, as part of the building plan check and development review process. Compliance with the requirements of the CBC and Inglewood Municipal Code would reduce potential impacts related to expansive soils to a less than significant level.

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.

Impact GEO-5: The Westchester/Veterans and Crenshaw/Imperial TOD Plans require all permitted development to connect to municipal sewage systems, and no septic tanks or alternative wastewater disposal systems would be used. As a result, *no impact* would result.

Methodology

Because all site-specific development permitted by the proposed TOD Plans would be connected to municipal sewage systems, no analysis related to the potential use of septic tanks or alternative wastewater disposal systems was necessary.

Impact Assessment

The City of Inglewood, including the TOD Plan areas, is served by a comprehensive network of sewer lines that are owned and maintained by the City's Public Works Department. All site-specific development permitted by the proposed TOD Plans would be connected to the municipal system, with sewage treated at Los Angeles County Sanitation Districts regional treatment facilities. No septic tanks or alternative wastewater systems would be used within the TOD Plan areas.

Significance Conclusion for Impact GEO-5

No septic tanks or alternative wastewater systems would be used within the TOD Plan areas, and no impacts related to whether soils are capable of supporting such systems would result.

Threshold GEO-6: Directly or indirectly destroy a unique paleontological resource or unique geologic feature.

Impact GEO-6: Future development permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans could destroy a previously unknown unique paleontological resource as the result of future site preparation and grading activities at depths below those of previous development. Because the TOD Plan areas are located on a coastal plain, no unique geologic features could be disturbed. Compliance with existing regulations and implementation of EIR mitigation measures would reduce this potential impact to a less-than-significant level. The impact would therefore be *significant but mitigable*.

Methodology

A formation or rock unit is determined to have paleontological sensitivity based on previous studies of sediment types in the region that contain vertebrate, invertebrate, or plant fossils. All sedimentary rocks and certain volcanic and mildly metamorphosed rocks are considered to have sensitivity for paleontological resources. Hence, a determination of the potential of paleontological resources to exist is based on the types of soils and rock that underlie the TOD Plan areas and the potential for fossils to occur in that unit, because the actual existence of fossils cannot typically be known until excavation for a site-specific development project is underway.

The potential of the proposed TOD Plans to result in impacts on paleontological resources is based on identification of the rock and soils in the TOD Plan areas. Ground disturbance in geologic units and geographic areas known to contain scientifically significant fossils would be considered to have a significant impact on non-renewable paleontological resources (CEQA Guidelines Sections 15064.5 and 15023, and CEQA Guidelines Appendix G, Section V, Part C).

Impact Assessment

The TOD Plan areas are underlain by two different types of alluvium soils, undifferentiated late Pleistocene alluvium and late Holocene alluvium. The Holocene deposits are generally considered too young to contain fossil resources; however, the Pleistocene alluvial fan deposits could contain significant resources. Specifically, Pleistocene older alluvium in Los Angeles County and most of southern California has been reported to contain locally abundant and scientifically significant vertebrate, invertebrate, and plant fossils. Pleistocene alluvial fan deposits are known to exist in portions of the TOD Plan area, such as the Centinela Springs area that is known to have attracted prehistoric animals (City, 2006 and 2010), and in the Florence Avenue area between La Brea and Centinela Avenues (Leighton 2012). Thus, paleontological

resources are likely to exist in these areas and potentially other portions of the TOD Plan areas. As a result, there is potential for future site-specific development projects permitted by the proposed TOD Plans that involve grading and excavation of vacant sites or to greater depths than previously undertaken for currently developed sites to directly or indirectly destroy a previously unknown unique paleontological resource or site.

Significance Conclusion for Impact CUL-6

Because the TOD Plan areas are located on a coastal plain, no unique geologic features could be disturbed. Future development permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans could, however, destroy a previously unknown buried paleontological resource as the result of future site preparation and grading activities at depths below those of previous site development. Thus, a significant impact would result, requiring mitigation.

Mitigation Measures

Mitigation Measure CUL-6: Prior to the issuance of a grading permit and/or action that would permit site disturbance in native ground (below soils that were disturbed by previous development activities), (whichever occurs first, the applicant/developer shall provide written evidence to the City Planning Division that a qualified paleontologist has been retained to respond on an as-needed basis to address unanticipated paleontological discoveries, and the paleontological requirements shall be incorporated into all development plans submitted and included as conditions of approval. In the event that paleontological resources are encountered during grading and construction operations, all construction activities shall be halted or redirected to provide for a qualified paleontologist to assess the find for significance and, if necessary, develop a paleontological resources impact mitigation plan (PRIMP) for the review and approval by the City prior to resuming construction activities.

Projects that would not encounter previously undisturbed soils would not be required to retain a paleontologist. However, these projects shall demonstrate non-disturbance to the City through the appropriate construction plans or geotechnical studies prior to any earth disturbing activities.

Implementation: A qualified paleontologist shall be retained by the applicant/developer to respond on an as-needed basis to address unanticipated paleontological discoveries. In addition, the paleontological requirements shall be incorporated into all development plans submitted and included as conditions of approval.

Significance Conclusion for Impact CUL-4 with Implementation of Mitigation Measure

Mitigation Measure CUL-4 addresses the potential for paleontological resources to be uncovered during earthmoving activities and provides for preservation of any uncovered resources that might be unique or significant. With implementation this mitigation measure, impacts related to a destruction of a unique paleontological resource or unique geologic feature would be less than significant.

3.13.6 REFERENCES

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3.14 PUBLIC SERVICES AND FACILITIES

3.14.1 INTRODUCTION

This section of the EIR addresses the physical environmental effects of new or expanded governmental facilities that are necessary to maintain acceptable service levels for police, fire protection, schools, and libraries. Because CEQA focuses on physical environmental effects, this section analyzes whether increased service demands from site-specific development projects permitted by the proposed TOD Plans could lead to the need for new or expanded public facilities that would in turn cause significant adverse environmental effects. Thus, an increase in demand for public services, expansion of staffing associated with provision of a public service, or an increase in students at local schools would not, by itself, be considered a physical change in the environment or an environmental impact. However, physical changes to the environment resulting from construction of new facilities or an expansion of existing facilities to accommodate the increased demand, staff, or students would be considered a physical change in the environment that could constitute a significant impact.

3.14.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

The proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans is subject to a range of state and local plans, policies, and regulations, which are described below.

State Plans, Policies, and Regulations

Building Standards

The California Building Standards Code establishes building requirements for construction and renovation. The most recent version of the California Building Standards Code was adopted in 2016 by the California Building Standards Commission and took effect January 1, 2017. It is based on the International Code Council's Building and Fire Codes. Included in the California Building Standards Code are the Electrical Code, Mechanical Code, Plumbing Code, Energy Code, and Fire Code.

The California Health and Safety Code, Section 13000, et seq., includes regulations concerning building standards (as also set forth in the California Building Code), fire protection systems, fire protection devices (such as extinguishers and smoke alarms, and high-rise building standards), and standards for building inspection and certification.

The California Fire Code (CFC) and Office of the State Fire Marshal provide regulations and guidance for local agencies in the development and enforcement of fire safety standards. The CFC

also establishes minimum requirements that would provide a reasonable degree of safety from fire, panic, and explosion.

School Facilities Financing Act and Education Code

The State of California Government Code Sections 53080, 65995, and 66001 authorize school districts to collect fees from new residential and commercial development. Additionally, California Education Code Sections 17620 through 17626 state that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities, subject to any limitations set forth in Chapter 4.9 (commencing with Section 65995) of Division 1 of Title 7 of the Government Code.

Senate Bill 50 - Leroy F. Greene Schools Facilities Act of 1998

Senate Bill (SB) 50, or the Leroy F. Greene School Facilities Act of 1998, restricts the ability of local agencies to deny project approvals on the basis that public school facilities (classrooms, auditoriums, etc.) are inadequate. School impact fees are collected at the time when building permits are issued. Payment of school fees is required by SB 50 for all new residential development projects and is considered "full and complete mitigation" of any school impacts. School impact fees are payments to offset capital cost impacts associated with new developments, which result primarily from costs of additional facilities, related furnishings and equipment, and projected capital maintenance requirements. As such, agencies cannot require additional mitigation for any school impacts.

Local Plans, Policies, and Regulations

City Inglewood General Plan

Police and Fire Services Policy

Maintain the present high level of police and fire services to the extent it is fiscally prudent.

Libraries Policy

Encourage the retention of high-quality library services.

3.14.3 ENVIRONMENTAL SETTING

a. Police Services

The City of Inglewood receives law enforcement services from the City of Inglewood Police Department, which operates from a single police station located at One Manchester Boulevard (City Hall). The Police Department currently employs 171 sworn personnel and 64 civilian support personnel. The Department has multiple resources, such as four specially trained canine teams, scientific services investigators, detective bureau, bike teams, community affairs, and administrative services. In addition, the Police Department maintains a detention facility for adult arrestees that was remodeled in 2012 and has the capacity to hold 53 people. Prisoners are held until they go to court or are otherwise released.

The Inglewood Police Department also operates a communication center that dispatches both emergency and non-emergency calls for police, medical, and fire assistance. The fire service calls are transferred to the Los Angeles County Fire Department, which serves the City.

The City currently has a ratio of approximately 1.5 sworn officers per 1,000 residents, based on the City's 2018 population of 113,559. Average response times are six minutes for emergency calls and 18 minutes for non-emergency calls for service.

To determine department needs, the Police Department optimizes available resources to handle the number of calls it receives each year, shifting resources, and adding personnel and facilities on an as-needed basis, rather than utilizing standard personnel-to-population ratio, minimum response time, or number of calls per capita criteria.

The existing Police Station is anticipated to continue to serve the City in the future through buildout of the TOD Plan. In addition, the Hollywood Park Redevelopment Project, which is located east of the Westchester TOD Plan area, includes an on-site police substation, which would be able to house additional Police Department staffing and equipment within the City (City, 2009).

b. Fire Protection Services

The City of Inglewood receives fire protection and paramedic services from Los Angeles County Fire Department (LACFD). Services provided by the Fire Department include fire suppression, hazardous materials protection, emergency medical treatment, including basic and advanced life support transportation, earthquake and fire safety planning, fire inspections, and building plan reviews.

The City of Inglewood is within the service area of Battalion 20 in Division 6 of the LACFD. Battalion 20 operates six stations, five of these have jurisdiction within the City of Inglewood,

four of which are located within the City. In addition, 10 fire stations are located within a three-mile radius of the City of Inglewood boundary, and are located within the Cities of Hawthorne, Gardena, and Lawndale and within the unincorporated communities of West Athens, Lennox, and Baldwin Hills. The nearest fire stations to the TOD Plan areas include Station 171, which is within the Downtown area, and Station 170, which is approximately one-half mile north of the intersection of Crenshaw Boulevard and Imperial Highway, at the center of the Crenshaw/Imperial TOD Plan area. The location and staffing of the fire stations primarily serving the TOD Plan areas are listed in **Table 3.14-1**.

TABLE 3.14-1: FIRE STATIONS THAT PRIMARILY SERVE THE TOD PLAN AREAS

Station	Location	Equipment	Staffing
Station 171	141 West Regent Street	3-person engine company 2-person paramedic squad	1 captain 1 firefighter specialist 3 firefighter paramedics 1 battalion chief 1 deputy fire chief
Station 170	10701 South Crenshaw Blvd.	4-person truck company 2-person engine company	1 captain 2 firefighter specialists 2 firefighters 1 firefighter paramedic

Source: Los Angeles County Fire Department.

The Los Angeles County Fire Department uses nationally accepted guidelines for response times in urban areas: 5 minutes for a first-responding or basic life support unit (usually an engine company) and 8 minutes for an advanced life support (paramedic) unit. Services within the City of Inglewood currently meet these guidelines. In 2015, the average response times of the fire stations serving the City were between 4:20 and 4:37 minutes. Fire Station 170 had an average emergency incident response time of 4:20 minutes; Station 171 had an average emergency incident response time of 4:22 minutes (Fire Department 2016).

In addition to the fire stations that primarily serve the City, personnel and equipment from stations located outside Inglewood respond to calls regularly. Under the Los Angeles County Fire Department service concept, emergency units are dispatched as needed to an incident anywhere in the Los Angeles County Fire Department's service territory based on the distance and availability, without regard to municipal boundaries. Due to the number of fire stations in the area, facilities exist to respond to a large incident or multiple simultaneous incidents in or near the City of Inglewood.

c. Schools

The TOD Plan areas are located within the Inglewood Unified School District (IUSD), which provides school services for grades kindergarten (K) through 12. IUSD serves approximately

8,400 students in 18 schools in the City of Inglewood and an adjacent section of unincorporated Los Angeles County (Ladera Heights).

On September 17, 2018, AB 1840 was signed into law and reassigned supervision of the District from the State Superintendent of Public Instruction to the Superintendent of the Los Angeles County Office of Education (LACOE). The elected IUSD Board of Education serves in an advisory capacity to the County Administrator.

The district's schools include one preschool child development center, three K-5 schools, seven K-6 schools, one K-8 school, one middle (6-8) school, one middle (7-8) school, three high schools, one district-operated charter school (K-8), and one career technical education/adult education/alternative education school. Numerous independent charter schools are also located in the district.

Between fiscal years 2005-2006 and 2019-2020 the district's average daily attendance has decreased by approximately 44 percent – from about 15,000 students to about 8,400 in the 2019-2020 school year. This is due to a maturing local population, declining birth rates, and an increasing number of students enrolled in privately operated charter schools.

According to the Inglewood Unified School District Progress Report prepared by the California School Information Services' Fiscal Crisis & Management Assistant Team, the District's "facilities capacity is roughly twice the amount needed to house its total student enrollment. Most of this excess capacity is old and in disrepair." As a result, the District is confronted with maintaining aging facilities on a maintenance budget that might be considered adequate for a district half IUSD's size (FMCAT, 2017). Because the District is in the process of aligning its student enrollment capacity with its current and projected student enrollment, including phasing out the use of older portable classrooms, implementing a program to reduce class sizes, and updating its facilities master plan, precisely defining excess classroom capacity is difficult.

The Inglewood Unified School District is currently undertaking several facilities improvements, funded by a \$90 million bond measure approved by the community in 2012 and more than \$40 million pledged by the Los Angeles World Airports for schools that lie along its flight paths. These sources of funding are helping meet the more than \$420 million in facility and repair needs to ensure students and staff have access to safe, high quality physical spaces that support learning. In addition, IUSD has received project-specific support from community partners, such as the Los Angeles Rams, Chargers, and Clippers.

d. Public Libraries

The Inglewood Parks, Recreation, and Library Services Department currently manages and operates two libraries, the Main Library and the Crenshaw-Imperial Branch Library. The Inglewood Main Library, located at 101 W. Manchester Boulevard, is located within the

Downtown area, and also serves the Westchester/Veterans TOD Plan area. The Crenshaw-Imperial Branch Library is located at 11141 Crenshaw Boulevard within the Crenshaw/Imperial TOD Plan area.

The Inglewood library system includes materials and databases including books, magazines, periodicals, business materials, software, sound recordings, computer games, reference documents, and community information. The library is also a federal and state depository with thousands of government documents, many available as full-text pdf documents. The library provides free public Internet access, and has the following resources:

- Over 262,000 titles and over 292,000 other items.
- Dozens of databases with access to over one hundred-million articles, charts, dictionaries, and audio and video clips.
- Approximately 500 magazine subscriptions.
- Thousands of e-books and e-journals that can be accessed from the internet.
- Large collection of DVDs and CDs.
- A law library collection.
- A specialized tax and business reference collection.
- Professional librarians and support staff to provide assistance finding information or materials.
- Programs and materials for children and young adults that includes more than 68,000 books, videos, and sound recordings.
- Hispanic Services is provided as part of the Adult Reference division. The library maintains a collection of materials and resources in Spanish and provides reference and information services in Spanish to Spanish-speaking people, and to those interested in Hispanic and Latin American culture and the Spanish language.
- A language learning tool (MANGO) is also available to help people learn to speak and understand the English language.

Library service needs are changing with the advent of increasing resources being available online and the availability of high-speed internet services.

3.14.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of impacts related to public services and facilities. Appendix G of the CEQA Guidelines indicates that a project would have a significant effect if it were to:

Threshold PSF-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for the following public services: police protection, fire protection, schools, parks,¹ or other public facilities.

3.14.5 IMPACTS AND MITIGATION MEASURES

Threshold PSF-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.

Impact PSF-1.1: *Police Services.* The increased residential and non-residential development that would be permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would increase demand for police services during construction and ongoing operations. While increased police staffing would be needed, expansion of the Inglewood Police Department by 14 sworn officers over a period of 20-years would not require new police facilities, or the expansion of existing facilities. Thus, *no impact* would result.

Methodology

Determining the significance of impacts on police services is based on evaluating:

- The extent to which the proposed TOD Plans would increase demand for services;
- Whether increased demand for services generated by the TOD Plans would result in inadequate staffing levels and/or response times requiring construction of new facilities or expansion of existing facilities; and
- Whether such construction of new facilities or expansion of existing facilities would have an adverse physical effect on the environment.

¹ Analysis of impacts related to parks is provided in Section 3.16, *Recreational Resources*, of this EIR.

For police services, a significant impact would occur if (1) the TOD Plans generated the need for additional personnel or equipment that could not be accommodated within the existing station, requiring the construction of a new station or an expansion of the existing station (2) such construction or expansion would have an adverse physical effect on the environment.

Impact Assessment

Construction

As part of site-specific development and infrastructure projects permitted by the TOD Plans, varying amounts of construction equipment and materials would be stored on construction sites during non-working hours, creating a potential target for theft and vandalism. The result could be calls for service to the Inglewood Police Department. Because the TOD Plan areas are already developed with urban uses, future construction sites would replace existing developed uses. It is unlikely that the number of calls for police service to the construction sites would be substantially greater than the number of calls for service to existing uses current on such future construction sites.

Operations

As described in Section 3.3, *Population and Housing*, build out of the TOD Plans would result in a net total increase of approximately 4,090 residential units with a net population increase of 11,289 persons. In addition, the proposed TOD Plans are anticipated to generate a net increase of approximately 5,684 jobs within the Westchester/Veterans and Crenshaw/Imperial areas. This increase in development and persons within the TOD Plan areas would result for additional calls for police services.

Although the City does not utilize a standard personnel-to-population ratio to determine police service needs, the number of calls the Department handles per year is anticipated to increase incrementally as site-specific developments within the TOD Plan areas are constructed and occupied. To maintain the current ratio of 1.5 sworn officers per 1,000 residents, which is assumed to provide the same level of existing police services, the City would need 14 new officers by buildout of the TOD Plans, which is anticipated to occur over a 20-year timeframe.

Based on its ongoing practice, the Police Department would add staff and equipment on an as-needed basis in order to accommodate this incrementally increasing service demands.

However, build out of the proposed TOD Plans would not result or require development of new or expansion of existing Police Department facilities. The new police substation being developed in the mixed-use area of the Hollywood Park Project Site, would provide additional future police department facilities that would serve the City; and the additional 14 sworn officers that would be needed by build out of the TOD Plan could be accommodated by the

existing and planned facilities. Therefore, site-specific development projects permitted by the TOD Plans would not generate a need for new or physically altered facilities, and physical environmental impacts related to the provision of new or expanded police facilities would not occur.

Significance Conclusion for Impact PSF-1.1

While increased police staffing would be needed over time as the result of site-specific development projects permitted by the TOD Plans, expansion of the Inglewood Police Department by 14 sworn officers over a period of 20-years would not require new police facilities, or the expansion of existing facilities. Because no new facilities would be constructed and existing facilities would not require expansion, no impact would result.

Threshold PSF-1: **Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.**

Impact PSF-1.2: ***Fire Protection Services.* The increased residential and non-residential development that would be permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would increase demand for fire protection services during construction and ongoing operations. Given (1) the existing developed nature of the TOD Plan areas and the urban level of service already being provided, the location of two stations in proximity to the TOD Plan areas and an additional 10 fire stations within three miles of Inglewood’s boundaries, the increased demand for fire protection services resulting from the TOD Plans would not necessitate provision of new facilities or physical expansion of existing fire protection facilities. Thus, *no impact* would result.**

Methodology

Determining the significance of impacts on fire protection services is based on evaluating:

- The extent to which site-specific development projects permitted by the proposed TOD Plans would increase demand for services;

- Whether increased demand for services generated by site-specific development projects permitted by the TOD Plans would result in inadequate staffing levels and/or response times requiring construction of new facilities or expansion of existing facilities; and
- Whether such construction of new facilities or expansion of existing facilities would have an adverse physical effect on the environment.

For fire protection services, a significant impact would occur if (1) site-specific development projects permitted by the TOD Plans generated the need for additional personnel or equipment that could not be accommodated within existing stations serving the TOD Plan areas, requiring the construction of a new station or an expansion of an existing station (2) such construction or expansion would have an adverse physical effect on the environment.

Impact Assessment

Construction

As part of site-specific development projects permitted by the TOD Plans, varying amounts of construction equipment and materials would be stored and utilized on construction sites, creating a fires and accidents. Such construction activities could require fire protection services as the result of accidents, fires, spills of hazardous materials, or other similar incidents associated with demolition of existing structures, clearing and grubbing, site grading, and storage of flammable materials (e.g., lumber, paints, and solvents) for construction of new structures. These activities are typical of urban infill development and construction activities.

The result could be calls for service to the Los Angeles County Fire Department. Because the TOD Plan areas are already developed with urban uses, future construction sites would replace existing developed uses. It is unlikely that the number of calls for fire protection service to construction sites would be substantially greater than the number of calls for service to existing uses current on such future construction sites.

Operations

As described in Section 3.3, *Population and Housing*, build out of the TOD Plans would result in a net total increase of approximately 4,090 residential units with a net population increase of 11,289 persons. In addition, the proposed TOD Plans are anticipated to generate a net increase of approximately 5,684 jobs within the Westchester/Veterans and Crenshaw/Imperial areas. This increase in development and persons within the TOD Plan areas would increase demand for fire protection and emergency medical assistance services in the City.

As described above, there are two fire stations in proximity to the Westchester/Veterans TOD Plan area (Station 171) and the Crenshaw/Imperial TOD Plan area (Station 170). Ten additional

fire stations located within three miles of the City of Inglewood's boundaries. The TOD Plans would propose infill development, which would increase building area, residents, and employees. The result would be an increased number of calls for fire protection services over the anticipated 20-year buildout of the Plans. Over that time, the fire department would add staff and equipment to the existing stations on an as-needed basis to accommodate increased demands. Due to the large number of existing fire stations within the vicinity of the TOD Plan areas and the infill nature of the development that would occur within areas already being provide with an urban level of services, the increase in fire department staffing and equipment required to serve build out of the proposed TOD Plans would be accommodated by existing fire stations, and new or physically altered fire protection facilities would not be required. Thus, physical impacts to the environment related to the development of or expansion of fire department facilities would not occur.

Individual site-specific development projects that would be permitted by the TOD Plans would require fire detection and suppression systems (fire alarms and sprinklers), emergency access (fire lanes), and properly placed fire hydrants as required by the City's Municipal Code Chapter 6, Fire Prevention. These design elements are reviewed and approved by the Inglewood Public Works Division and Los Angeles County Fire Department prior to receipt of development permits for each site-specific development project in the City. These existing City procedures further minimize potential impacts associated with provision of fire protection services. Therefore, the TOD Plans would not require provision of new or physically altered fire protection facilities construction of which could cause significant environmental impacts.

Significance Conclusion for Impact PSF-1.2

The increased residential and non-residential development that would be permitted by the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would increase demand for fire protection services during construction and ongoing operations. Given (1) the existing developed nature of the TOD Plan areas and the urban level of service already being provided, the location of two stations in proximity to the TOD Plan areas and an additional 10 fire stations within three miles of Inglewood's boundaries, the increased demand for fire protection services resulting from the TOD Plans would not necessitate provision of new facilities or physical expansion of existing fire protection facilities. Thus, no impacts would result.

Threshold PSF-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.

Impact PSF-1.3: *Schools.* Buildout of the TOD Plans is anticipated to generate a total of approximately 1,018 K-12 school students, assuming that students within the TOD Plan areas attended privately operated charter schools at the current rate. The addition of 1,018 K-12 school students to IUSD's current enrollment would approximate the District's reported enrollment for the 2014-2015 school year. Payment of development impact fees, as required by Government Code Section 65995 and the Inglewood Unified School District would be required for each site-specific development project permitted by the TOD Plans, which would provide for funding of improvements to (rather than expansion of) existing facilities and would constitute mitigation of impacts related to the provision of school services. Since SB 50 development impact fees the statutory mitigation required for new development and no new or expanded school facilities will be required to house students from the TOD Plan areas, impacts would be *less than significant*.

Methodology

Determining the significance of impacts on schools is based on evaluating:

- The extent to which the proposed project would generate new students for local school districts;
- Whether the increased number of students generated by the proposed project could be accommodated within existing school facilities; and
- Whether any needed construction of new facilities or expansion of existing facilities would have an adverse physical effect on the environment.

For school facilities, a significant impact would occur if (1) the project generated an increased number of students that could not be accommodated within existing school facilities and would require the construction of a new school or an expansion of existing facilities that (2) would have an adverse physical effect on the environment.

Pursuant to the provisions of SB 50 (described above), impacts related to schools are considered to be less than significant with payment of development fees that were established to provide for school facilities construction, improvements, and expansion.

Impact Assessment

Inglewood Unified School District uses student generation rates to determine how many students would be generated by new residential dwelling units. **Table 3.14-2** provides a

summary of the generation factors per IUSD's designated grade groupings. As shown, buildout of the TOD Plans anticipated to generate a total of approximately 1,018 K-12 school students, assuming that students within the TOD Plan areas attended privately operated charter schools at the current rate. While an increase of 1,018 students represents a 10.5 percent increase over IUSD's current enrollment, the addition of 1,018 K-12 school students to IUSD's current enrollment would approximate the District's reported enrollment for the 2014-2015 school year.

TABLE 3.14-2: PROJECTED STUDENT GENERATION

Grade Grouping	Students per Multi-Family Unit	Students Generated from 4,090 net increase in Multi-Family Units
K-6	0.152	622
7-8	0.036	147
9-12	0.061	249
Total K-12	0.249	1,018

Source: IUSD, 2016.

IUSD's facilities capacity is roughly twice the amount needed to house its current student enrollment; however, most of this excess capacity is old and in disrepair. IUSD is engaged in making large-scale improvements to its school facilities. Measure GG was passed in November 2012, providing \$90 million in general obligation bonds for school improvements. A number of facilities improvements funded by Measure GG are underway. In addition, more than \$40 million has been pledged by the Los Angeles World Airports for schools that lie along its flight paths. These sources of funding are helping meet the more than \$420 million in facility and repair needs. The Los Angeles Rams, Chargers, and Clippers are also providing project-specific for school improvements.

As described above, SB 50 prohibits the denial of a land use application because of school capacity and specifically establishes a mandated fee for mitigation of impacts under CEQA. Government Code Section 65995 authorizes school districts to collect fees on future development at a minimum of \$3.48 per square foot for residential construction and \$0.56 for commercial/industrial construction (Level I fees). Level I fees are adjusted every two years according to the inflation rate. Higher fees are permitted for school districts that adopt long-range school facilities plans. Class B construction fees are determined by the State Allocation Board. Government Code Section 66001 requires that a reasonable relationship exist between the amount and use of the fees and the development on which the fees are to be charged. Per Government Code Section 65995, payment of these fees would constitute mitigation of impacts to school facilities that serve the TOD Plan areas. Payment of development impact fees, as required by Government Code Section 65995 and the Inglewood Unified School District would be required for each site-specific development project permitted by the TOD Plans, which

would provide for funding of improvements to (rather than expansion of) existing facilities and would constitute mitigation of impacts related to the provision of school services.

Significance Conclusion for Impact 3.14-1.3

Buildout of the TOD Plans anticipated to generate a total of approximately 1,018 K-12 school students, assuming that students within the TOD Plan areas attended privately operated charter schools at the current rate. The addition of 1,018 K-12 school students to IUSD's current enrollment would approximate the District's reported enrollment for the 2014-2015 school year. Payment of development impact fees, as required by Government Code Section 65995 and the Inglewood Unified School District would be required for each site-specific development project permitted by the TOD Plans, which would provide for funding of improvements to (rather than expansion of) existing facilities and would constitute mitigation of impacts related to the provision of school services. Since SB 50 development impact fees the statutory mitigation required for new development and no new or expanded school facilities will be required to house students from the TOD Plan areas, impacts would be less than significant.

Threshold PSF-1: **Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.**

Impact PSF-1.4: *Libraries.* New residential development within the TOD Plan areas would increase demand for library services and facilities. However, many of the residential units would be equipped with internet access and several multi-family housing complexes might also include computer centers, which would reduce any increased demand for library services and resources. Build out of the proposed TOD Plans would therefore not result in the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts. Therefore, *no impact* would result.

Methodology

Determining the significance of impacts on library services is based on evaluating:

- The extent to which the proposed project would increase demand for services;
- Whether project-related increased demand for services would result in inadequate facilities requiring construction of new facilities or expansion of existing facilities; and

- Whether such construction of new facilities or expansion of existing facilities would have an adverse physical effect on the environment.

For library services, a significant impact would occur if (1) the project generated the need for library space that could not be accommodated within the existing Inglewood Library, and would require the construction of a library or an expansion of the existing library that (2) would have an adverse physical effect on the environment.

The potential impacts related to libraries are considered in the context of the capacity and use of existing libraries. Due to the wide availability of information online, library usage has been declining in recent years and library service needs are changing with increasing resources being available online and the availability of high-speed internet services. As a result, library service standards (e.g., a certain number of volumes or square feet of building space per thousand residents) are no longer appropriate when assessing the needs of a municipal library. A more appropriate standard is related to the physical usage of the library facility in relation to its physical capacity. Thus, a significant impact would occur if the TOD Plans (1) generated the need for additional library services that could not be accommodated within existing facilities and (2) would require the construction of a new library or the expansion of an existing library, which could have an adverse physical effect on the environment.

Commercial and employment-generating land uses do not typically generate a demand for library services. As such, the analysis of impacts on library services is based on the number of residents generated by the TOD Plans and their anticipated usage of library facilities.

Impact Assessment

The addition of 11,289 new residents within the TOD Plan areas over the next 20 years would increase demand for library services and facilities. However, many of the residential units would be equipped with internet access and several multi-family housing complexes might also include computer centers, which provide access to many of the same resources provided by the library and thereby limit the increased demand for library services and resources. Thus, the existing library facilities would be able to accommodate the increased demand from the addition of new residents from the TOD Plan areas. Build out of the proposed TOD Plan would therefore not result in the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts. Therefore, impacts to library services associated with site-specific development projects permitted by the proposed TOD Plans would not occur.

Significance Conclusion for Impact PSF-1.4

New residential development within the TOD Plan areas would increase demand for library services and facilities. However, many of the residential units would be equipped with internet

access and several multi-family housing complexes might also include computer centers, which would reduce any increased demand for library services and resources. Build out of the proposed TOD Plans would therefore not result in the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts. Therefore, no impact to library services would occur.

3.14.6 REFERENCES - PUBLIC SERVICES AND FACILITIES

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3.15 UTILITIES, SERVICE SYSTEMS, AND WATER SUPPLY

3.15.1 INTRODUCTION

a. Overview

This section of the EIR addresses the physical environmental effects of new or expanded facilities to maintain acceptable service levels in relation to utilities and service systems, including water and wastewater utilities, storm drainage, and non-hazardous solid waste management. Because CEQA focuses on physical environmental effects, this section analyzes whether increases in demand that would result from the proposed TOD Plans would result in significant adverse physical environmental effects.

For example, an increase in sewage generation, by itself, would not be considered a physical change in the environment; however, physical changes in the environment resulting from the construction of new facilities or an expansion of existing wastewater facilities could constitute a significant impact. This section also addresses water demand, supply, and reliability for the proposed TOD Plans for the Westchester/Veterans and Crenshaw/Imperial areas. Flood management and storm drain facilities are addressed in Section 3.14, *Public Services*. Energy, energy infrastructure, and renewable energy resources are discussed in Section 3.9, *Energy Resources*.

b. Definitions

100-Year Flood is a flood that has a 1 percent statistical chance of occurring in any given year. The 100-year flood can, however, also occur in consecutive years or multiple times within a year. Similarly, a 25-year flood has a 4 percent statistical chance of occurring in any given year but could also occur in consecutive years or multiple times within a year.

Acre-Foot is the volume of water required to cover 1 acre of land (43,560 square feet) to a depth of 1 foot. It is equal to 43,560 cubic feet or 325,851 gallons.

Biofiltration refers to the use of plants and landscaping to capture and biologically degrade pollutants. Capturing harmful chemicals or silt from surface runoff is a common form of biofiltration.

Flooded refers to any condition in which the soil surface is temporarily covered with flowing water from any source, such as streams overflowing their banks, runoff from adjacent or surrounding slopes, inflow from high tides, or any combination of sources.

Frequency (Inundation) refers to the average frequency of flooding by surface water or soil saturation. It is usually expressed as the number of years (e.g., 50 years) the soil is inundated or saturated at least once during a year.

Inundation is the condition in which water from any source temporarily or permanently covers a land surface.

Recycled Water is former wastewater (sewage) that is treated to remove solids and impurities to a level that is safe for beneficial uses, such as landscape irrigation. The purpose of water recycling using these processes is to conserve water, rather than simply discharging treated wastewater.

Stormwater refers to discharges generated by runoff from land and impervious areas, such as paved streets, parking lots, and building rooftops, during rainfall and snow events that often contain pollutants in quantities that could adversely affect water quality. Most stormwater discharges are considered point sources and require coverage by a National Pollutant Discharge Elimination System (NPDES) permit.

3.15.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

Implementation of proposed TOD Plans is subject to a range of federal, state, and local plans, policies, and regulations, which are described below.

a. Federal Plans, Policies, and Regulations

Water Facilities and Water Supply

Safe Drinking Water Act

The United States Environmental Protection Agency (USEPA) administers the Safe Drinking Water Act, which is the primary federal law that regulates the quality of drinking water and establishes standards to protect public health and safety. The Department of Health Services (DHS) implements the requirements of the Act and oversees public water system quality state-wide. DHS establishes legal drinking water standards for contaminants that could threaten public health.

Wastewater

Clean Water Act

The Clean Water Act established the basic structure for regulating discharges of pollutants into “waters of the U.S.” The Act specifies a variety of regulatory and non-regulatory tools to

manage stormwater runoff. Clean Water Act Section 402 is relevant to drainage in the proposed Specific Plan area.

Section 402 regulates point- and nonpoint-source discharges to surface waters through the National Pollutant Discharge Elimination System (NPDES) program. In California, the State Water Resources Control Board (SWRCB) oversees the NPDES program, which is administered by the Regional Water Quality Control Boards (RWQCBs). The NPDES program provides for both general permits (those that cover a number of similar or related activities) and individual permits.

National Pollutant Discharge Elimination System

The NPDES permit system was established in the federal Clean Water Act to regulate both point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges (diffuse runoff of water from adjacent land uses) to surface waters of the United States. For point source discharges, such as sewer outfalls, each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge.

Stormwater Drainage

Clean Water Act

The Clean Water Act established the basic structure for regulating discharges of pollutants into “waters of the U.S.” The act specifies a variety of regulatory and non-regulatory tools to manage stormwater runoff. Clean Water Act Section 402 is relevant to drainage in the proposed TOD Plan.

Section 402 regulates point- and nonpoint-source discharges to surface waters through the National Pollutant Discharge Elimination System (NPDES) program. In California, the State Water Resources Control Board (SWRCB) oversees the NPDES program, which is administered by the RWQCBs. The NPDES program provides for both general permits (those that cover a number of similar or related activities) and individual permits.

National Pollutant Discharge Elimination System

The NPDES permit program under the Clean Water Act controls point and nonpoint water sources that discharge into “waters of the U.S.” California has an approved state NPDES program. The USEPA has delegated authority for NPDES permitting to the California State Water Resources Control Board (SWRCB), which has nine regional boards. The Los Angeles Regional Water Quality Control Board (LARWQCB or RWQCB) area includes the City of

Inglewood. Under this system, discharge of stormwater runoff from construction areas of one acre or more requires either an individual permit issued by the RWQCB or coverage under the statewide Construction General Stormwater Permit for stormwater discharges. In addition, operational water discharges from land use operations that have direct stormwater discharges to navigable waters, are also required to obtain either an individual permit or obtain coverage under the statewide General Industrial Stormwater Permit.

b. State Plans, Policies, and Regulations

Water Facilities and Water Supply

California Urban Water Management Planning Act

Section 10610 of the California Water Code established the California Urban Water Management Planning Act (CUWMPA), which requires urban water suppliers to initiate planning strategies to ensure an appropriate level of water service reliability. The CUWMPA states that every urban water supplier that provides water to 3,000 or more customers, or that annually provides more than 3,000 acre-feet (AF) of water service, should make every effort to ensure the appropriate level of reliability in its water service to meet the needs of its various categories of customers during normal, dry, and multiple-dry years. The CUWMPA describes the contents of Urban Water Management Plans as well as methods for urban water suppliers to adopt and implement the plans.

Senate Bill 610

Senate Bill (SB) 610 requires public urban water suppliers with 3,000 or more service connections to identify existing and planned sources of water for planned developments of a certain size. It further requires the public water system to prepare a specified Water Supply Assessment for the following types of projects:

- a) A proposed residential development of more than 500 dwelling units;
- b) A proposed shopping center employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- c) A commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- d) A hotel or motel, or both, with more than 500 rooms;
- e) An industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 sf of floor area; or
- f) A mixed-use project that includes one or more of the projects above.

A Water Supply Assessment must address existing water demand and future water demand by the project and must ensure that water is available for the project during normal years, a single dry year, and multiple dry years during a 20-year future projection period. The Water Supply Assessment must also describe whether the project's water demand is accounted for in the water supplier's Urban Water Management Plan. Supplies of water for future use must be documented in the Water Supply Assessment.

Senate Bill 221

SB 221 requires the local water provider to provide "written verification" of "sufficient water supplies" to serve the project. SB 221 applies only to residential projects of 500 units or more (infill or low-income or very-low-income housing subdivisions are exempt) and requires the land use planning agency to include as a condition of approval of a tentative map, parcel map, or development agreement a requirement that "sufficient water supply" be available. SB 221 differs from SB 610 in that "sufficiency" is determined by considering the availability of water over the past 20 years, the applicability of any urban water shortage contingency analysis prepared pursuant to Water Code Section 10632, the reduction in water supply allocated to a specific use by an adopted ordinance, and the amount of water that can be reasonably relied upon from other water supply projects, such as conjunctive use, reclaimed water, water conservation, and water transfer. In most cases, the Water Supply Assessment prepared under SB 610 meets the requirement for proof of water supply under SB 221.

California Green Building Standards Code

California Code of Regulations Title 24, Part 11, establishes the California Green Building Standards Code or CALGreen Code. The CALGreen Code was updated in 2013 and went into effect January 1, 2014. The CALGreen Code sets forth water efficiency standards (i.e., maximum flow rates) for all new federally regulated plumbing fittings and fixtures.

Governor Brown's Executive Order B-29-15

On April 1, 2015, Governor Brown issued Executive Order B-29-15, finding that, among other things, "...conditions of extreme peril to the safety of persons and property continue to exist in California due to water shortage and drought conditions..." and ordering that, among other things, the "State Water Resources Control Board shall impose restrictions to achieve a statewide 25 percent reduction in potable urban water usage through February 28, 2016. These restrictions will require water suppliers to California's cities and towns to reduce usage as compared to the amount used in 2013. These restrictions should consider the relative per capita water usage of each water suppliers' service area and require that those areas with high per capita use achieve proportionally greater reductions than those with low use." On July 15, 2015, the SWRCB released the water-use-reduction targets that were imposed on each individual

urban water supplier. Then, based on rainfall, the reduction targets were revised, and the new targets became effective March 1, 2016. The City's reduction target reflects the state-wide standard.

State Water Resources Control Board Statewide General Waste Discharge Requirements (WDRs) for Sanitary Sewer Systems

The Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (SWRCB Order No 2006-0003-DWQ) applies to sanitary sewer systems that are greater than 1 mile long and collect or convey untreated or partially treated wastewater to a publicly owned treatment facility. The goal of Order No. 2006-0003 is to provide a consistent state-wide approach for reducing Sanitary Sewer Overflows (SSOs), accidental releases of untreated or partially treated wastewater from sanitary sewer systems, by requiring that:

1. In the event of an SSO, all feasible steps must be taken to control the released volume and prevent untreated wastewater from entering storm drains, creeks, etc.
2. If an SSO occurs, it must be reported to the SWRCB using an online reporting system developed by the SWRCB.
3. All publicly owned collection system agencies with more than 1 mile of sewer pipe in the state must develop a Sewer System Management Plan (SSMP), which must be updated every 5 years.

Construction General Permit

The State of California adopted a Statewide NPDES Permit for General Construction Activity (Construction General Permit) on September 2, 2009 (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The last Construction General Permit amendment became effective on February 16, 2012. The Construction General Permit regulates construction site storm water management. Dischargers whose projects disturb 1 or more acres of soil, or whose projects disturb less than 1 acre but are part of a larger common plan of development that in total disturbs 1 or more acres, are required to obtain coverage under the general permit for discharges of storm water associated with construction activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.

To obtain coverage under this permit, project operators must electronically file Permit Registration Documents, which include a Notice of Intent, a Storm Water Pollution Prevention Plan (SWPPP), and other compliance-related documents. The SWPPP is required to identify specific Best Management Practices (BMPs) that would be implemented to control drainage from project sites.

State Water Resources Control Board Low Impact Development Policy

The SWRCB adopted the Low Impact Development (LID) Policy which, at its core, promotes the idea of “sustainability” as a key parameter to be prioritized during the design and planning process for future development. The SWRCB has directed its staff to consider sustainability in all future policies, guidelines, and regulatory actions. LID is a proven approach to manage storm water. The RWQCBs are advancing LID in California in various ways, including provisions for LID requirements in renewed Phase I municipal storm water NPDES permits.

Wastewater

State Water Resources Control Board Statewide General Waste Discharge Requirements (WDRs) for Sanitary Sewer Systems

The Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (SWRCB Order No 2006-0003-DWQ) applies to sanitary sewer systems that are greater than one-mile-long and collect or convey untreated or partially treated wastewater to a publicly owned treatment facility. The goal of Order No. 2006-0003 is to provide a consistent statewide approach for reducing Sanitary Sewer Overflows (SSOs), accidental releases of untreated or partially treated wastewater from sanitary sewer systems, by requiring that:

1. In the event of an SSO, all feasible steps be taken to control the released volume and prevent untreated wastewater from entering storm drains, creeks, etc.
2. If an SSO occurs, it must be reported to the SWRCB using an online reporting system developed by the SWRCB.
3. All publicly owned collection system agencies with more than one mile of sewer pipe in the State must develop a Sewer System Management Plan (SSMP), which must be updated every five years.

The City of Inglewood updated its Sewer System Master Plan in compliance with these requirements in 2015.

Regional Municipal Separate Storm Sewer System (MS4) Permits

The City of Inglewood is subject to the NPDES stormwater permit covering Los Angeles County (NPDES No. CAS614001). The Los Angeles RWQCB completed a revision of the NPDES permit for the Los Angeles region in 1996 and 2001. The MS4 Permit requires permittees to reduce the discharge of storm water pollutants to the maximum extent practicable and ensure MS4 discharges do not cause or contribute to violations of water quality standards. The MS4 Permit also requires implementation of various site design best management practices (BMPs) and treatment control BMPs to reduce the possibility of pollutants stored or produced on-site from

entering surface water or sewer system. Requirements of the MS4 Permit would be applicable to development pursuant to the proposed TOD Plan.

Stormwater Drainage

National Pollutant Discharge Elimination System Permits

The NPDES permit system was established in the federal Clean Water Act to regulate both point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges (diffuse runoff of water from adjacent land uses) to surface waters of the United States. For point source discharges, such as sewer outfalls, each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge.

Construction General Permit

The State of California adopted a Statewide NPDES Permit for General Construction Activity (Construction General Permit) on September 2, 2009 (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The last Construction General Permit amendment became effective on February 16, 2012. The Construction General Permit regulates construction site storm water management. Dischargers whose projects disturb one or more acres of soil, or whose projects disturb less than one acre, but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the general permit for discharges of storm water associated with construction activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.

To obtain coverage under this permit, project operators must electronically file Permit Registration Documents, which include a Notice of Intent, a Storm Water Pollution Prevention Plan (SWPPP), and other compliance-related documents. The SWPPP is required to identify specific BMPs that would be implemented to control drainage from project sites.

California Water Resources Control Board Low Impact Development Policy

The SWRCB adopted the Low Impact Development (LID) Policy which, at its core, promotes the idea of “sustainability” as a key parameter to be prioritized during the design and planning process for future development. The SWRCB has directed its staff to consider sustainability in all future policies, guidelines, and regulatory actions. LID is a proven approach to manage stormwater. The RWQCBs are advancing LID in California in various ways, including provisions for LID requirements in renewed Phase I municipal stormwater NPDES permits.

Non-Hazardous Solid Waste Management

California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) redefined solid waste management in terms of both objectives and planning responsibilities for local jurisdictions and the state. The Act was adopted in an effort to reduce the volume and toxicity of solid waste that is landfilled and incinerated by requiring local governments to prepare and implement plans to improve the management of waste resources. AB 939 required each of the cities and unincorporated portions of the counties to divert a minimum of 25 percent of the solid waste sent to landfills by 1995, and 50 percent by the year 2000. To attain goals for reductions in disposal, AB 939 established a planning hierarchy using new integrated solid waste management practices. These practices include source reduction, recycling and composting, and environmentally safe landfill disposal and transformation.

Other state statutes pertaining to solid waste include compliance with the California Solid Waste Reuse and Recycling Act of 1991 (AB 1327), which requires adequate areas for collecting and loading recyclable materials within a project site.

Assembly Bill 341

On October 6, 2011, Governor Brown signed AB 341 establishing a state policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020, and requiring the California Department of Resources Recycling and Recovery (CalRecycle) to provide a report to the Legislature that recommends strategies to achieve the policy goal by January 1, 2014. The bill also mandates local jurisdictions to implement commercial recycling by July 1, 2012.

c. Regional and Local Plans, Policies, and Regulations

Water Facilities and Water Supply

2015 Urban Water Management Plan

The City, as well as any water agency serving over 3,000 acre-feet of water annually or providing service to more than 3,000 customers, is required to prepare an Urban Water management plan (UWMP) in years ending in 5 and 0 and submit it to the Department of Water Resources (DWR). The UWMP Act requires applicable water agencies to develop an UWMP to provide a framework for long term water planning and to inform the public of the supplier's plans to ensure adequate water supplies for existing and future demands. The City's 2015

UWMP was adopted in October 2016 and the 2020 UWMP update is in preparation as of the writing of this document.

The 2015 UWMP assesses the reliability of the agency's water supplies over a 20-year planning horizon and report its progress on 20 percent reduction in per-capita urban water consumption by the year 2020 as required in the Water Conservation Bill of 2009 (SBx7-7). The UWMP projects that the City's per-capita water use will increase slightly by 2020, and then decrease by 2040. TE UWMP concludes that the combination of the Metropolitan Water District's ability to meet all full-service demands of its member agencies through 2040 with surplus supplies, and the City's goal to regularly upgrade and rehabilitate its well supply system to maintain groundwater supply equivalent to its groundwater rights of 4,500 AFY, Inglewood will be able to meet all normal year, single dry year, and multiple dry year demands through the year 2040.

City of Inglewood Municipal Code

Section 5-112, Water Efficiency in the Landscape, of the City's Municipal Code establishes procedures and standards for the design, installation, and maintenance of water-efficient landscapes in conjunction with new construction projects in the City. This section of the Municipal Code promotes conservation and efficient use of water in order to prevent the waste of water resources.

Article 19, Water Conservation and Water Supply Shortage Program, of the Municipal Code establishes a water conservation and water supply shortage program to reduce water consumption through conservation, enabling effective water supply planning, assuring reasonable and beneficial use of water, preventing waste of water, and maximizing the efficient use of water within the City. In addition, Article 19 of the Municipal Code establishes permanent water conservation standards and establishes three levels of water supply shortage response actions to be implemented during times of declared water shortage or declared water shortage emergency, with increasing restrictions on water use in response to worsening drought or emergency conditions and decreasing supplies.

Wastewater

Inglewood Municipal Code

Chapter 10 Public Works, Article 7 Sewer Connection

Section 10-89, Determination of Capacity, states that the size and grade of each public sewer must be such as to provide at all times sufficient capacity for peak flow rates of discharge. The Public Works Director shall determine what capacity is necessary in each public sewer to provide for the proper collection of sewage in the City. In the event a lot in the City is to

undergo development or redevelopment, and the anticipated sewage from the proposed use is found by the Public Works Director to exceed the capacity available in the public sewer, the building permit for such development or redevelopment shall not be issued until such time as capacity in the public sewer is available or can be made available before the building is occupied. **Table 3.15-1** establishes a basis for computing average daily flow to the sanitary sewer:

All other land uses not included in the Table are classified by the occupancy it most nearly resembles as determined by the Public Works Director or computed by him or her in accordance with the anticipated use. The daily flow to the sanitary sewer for a building containing mixed occupancies is determined by adding the peak flow characteristics of the various occupancies as set forth in the above table. The daily flow from a room or building which is used for different occupancies at different times as determined by the occupancy which gives the largest peak flow.

Section 10-221, General Limitations, Prohibitions, and Requirements on Fats, Oils, and Grease (FOG) Discharges, establishes standards and discharge prohibitions for the release of substances into the sewer system. Section 10-222, FOG Wastewater Discharge Permits for Food Service Establishments, requires food service establishments to obtain a sewer permit that regulates the discharge of substances into the sewer system.

Stormwater Drainage

Los Angeles County Standard Urban Storm Water Mitigation Plan

Development in the City of Inglewood is subject to the Los Angeles County Standard Urban Storm Water Mitigation Plan (SUSMP), which provides drainage regulations for specific types of development projects. These types of development projects include:

- Ten or more dwelling units (includes single-family homes, multi-family homes, condominiums, and apartments);
- Automotive service facilities (SIC codes 5013, 5014, 5541, 7532-7534, and 7536-7539);
- Restaurants (SIC code 5812);
- 100,000 square feet or more of impervious surface in industrial/commercial
- Retail gasoline outlet;
- Parking lot 5,000 square feet or more of surface area or with 25 or more parking spaces;

Redevelopment projects in subject categories that meet redevelopment thresholds (SUSWMP 2000).

**TABLE 3.15-1
Inglewood Wastewater Generation Rates**

Land Use	Average Daily Flow
Apartment	200 gallons per dwelling unit
Assembly Areas	5 gallons for each 7 square feet of floor area usable for seating occupancy.
Auditorium	5 gallons for each 7 square feet of floor area usable for seating occupancy.
Bars and Cocktail Lounges	20 gallons for each 15 square feet of floor area usable for seating occupancy.
Churches	200 gallons per day per 1,000 square feet of floor area usable for seating occupancy
Hospitals	500 gallons per bed
Hotels	200 gallons per room or apartment unit.
Light Industrial	600 Gallons per 1,000 square feet of floor area.
Laundromat	75 gallons per machine
Medical Office	300 gallons per 1,000 square feet of floor area.
Motels	200 gallons per room
Office	200 gallons per 1,000 square feet of floor area.
Restaurant	50 gallons for each 15 square feet of floor area usable for seating occupancy
Schools	
Elementary	9 gallons per capita
Others	25 gallons per capita
Stand, for sale of lunches, ice cream, beverages & similar items	300 gallons per 1,000 square feet of floor area
Storage Garages and Warehouses	25 gallons per 1,000 square feet of floor area
Stores, Commercial, & Display	100 gallons per 1,000 square feet of floor area.

Source: City of Inglewood Municipal Code Section 10-89

Development projects, included in the list above would be required to comply with the County SUSMP submittal requirements, as listed below:

- Provide a hydrology analysis to determine the design flow rate (QPM) or Volume (VM) for the first 3/4-inch of rainfall that must be treated.
- Submit site specific hydraulic calculations along with the recommended structural BMP manufacturer's product specifications to verify the BMP will adequately handle the minimum design flow required for treatment.
- Show locations of BMPs on building/drainage plans.

- Determine and provide the pre and post development pervious and impervious areas created by the proposed development.
- Submit Operation and Maintenance Guidelines that include the designated responsible party to manage the SUSMP devices, employee’s training program and duties, operating schedule, maintenance frequency, routine service schedule, specific maintenance activities, copies of resource agency permits. Inspection and servicing of all SUSMP devices must occur on an annual basis at a minimum.

The County lists example BMPs to be implemented on sites that would aid in stormwater drainage; examples of these include using minimum pavement widths and permeable pavement, directing of rooftop runoff to pervious areas, and including vegetated swales and strips and infiltration basins throughout the development (SUSWMP, 2000).

City of Inglewood Municipal Code

Section 10-208, Low Impact Development Requirements for New Development and Redevelopment, establishes requirements for construction activities and facility operations of development and redevelopment projects to comply with the current MS4 Permit (Order No. R4-2012-0175), to lessen the water quality impacts of development by using smart growth practices, and integrate LID practices and standards for stormwater pollution mitigation through means of infiltration, evapotranspiration, biofiltration, and rainfall harvest and use. LID is required to be inclusive of new development and/or redevelopment requirements.

Non-Hazardous Solid Waste Management

Inglewood Municipal Code

Article 7 of the Inglewood Municipal Code (Construction and Demolition Recycling Program) requires diversion of a minimum of 50 percent of construction and demolition debris.

3.15.3 ENVIRONMENTAL SETTING

a. Water Facilities and Water Supply

City of Inglewood

The City of Inglewood provides water service for the entirety of the Westchester/Veterans TOD Plan area and for the portions of the Crenshaw/Imperial TOD Plan area within the northwest, northwest, and southwest quadrants of the Crenshaw Boulevard/Imperial Highway intersection.

The City obtains its potable water supply from two sources: imported surface water purchased from the Metropolitan Water District of Southern California (Metropolitan) through West Basin Municipal Water District (WBMWD), and local groundwater produced from the West Coast Groundwater Basin via City wells. The imported water is treated by Metropolitan, and the groundwater is treated at the City's Sanford M. Anderson Water Treatment Plant for the removal of iron and manganese. Treatment includes disinfection. The groundwater and imported water supplies are blended prior to entering the City's water distribution system.

In 2015, the City purchased approximately 80 percent of its potable water supply from WBMWD and produced approximately 20% of its potable water supply from the local groundwater basin via City owned and operated wells. However, the City is engaged in increasing groundwater production, and it is estimated that approximately 44 percent of the City's potable water supply will come from City groundwater in 2020 (UWMP, 2016).

The City purchases recycled water from WBMWD. The City currently has 18 service connections to the WBMWD recycled water system. City purchases of recycled water have averaged 721 AFY since 2005, which is approximately 6% of its total water supply. City recycled water use is projected to increase to approximately 1,060 AFY by 2020.

The City of Inglewood's potable water system consists of 152 miles of pipe varying in diameter from 3-inches to 30-inches, five groundwater wells, two booster pump stations, a groundwater treatment plant, two reservoirs, two imported water connections to the Metropolitan Water District (MWD), and a total of eight emergency interties with the Los Angeles Department of Water and Power and the Golden State Water Company (UWMP, 2016 and Kimley, 2015). The City has two reservoirs: North Inglewood and Morningside. The North Inglewood Reservoir was constructed in 1974 and has a total capacity is 4.6 million gallons. The Morningside Reservoir was constructed in 1954 and has a total capacity of 16 million gallons.

The Sanford M. Anderson Treatment Plant (Anderson Treatment Plant) processes raw groundwater pumped from the City's wells and is located on the southwest corner of Eucalyptus Avenue and Beach Avenue, which is within the Downtown TOD Plan area. Currently, the Anderson Treatment Plant has a treatment capacity of 8.64 million gallons per day (MGD). Treated groundwater leaving the Anderson Treatment Plant is pumped into one of the two storage reservoirs. While in route to the reservoirs, treated water supply from the Metropolitan Water District of Southern California (MWD) enters through the two imported water connections and blends with the treated groundwater leaving the Anderson Treatment Plant. Water is then distributed from the City reservoirs to users.

Within the TOD Plan areas, water lines are located in almost all streets and alleys and range in size from 4- to 16-inches in diameter. Almost all the existing water lines are older water pipes

made of asbestos cement, with some relatively new water lines that were installed in recent years, made of cast iron, pvc, copper, corrugated metal, and steel.

The City of Inglewood has an adjudicated share of the groundwater supply and is entitled to pump 4,449.89 acre-feet of groundwater annually from the West Coast Basin (WRD, 2018), in addition to any carryover or unused water rights from the previous year. In the 2016-2017 water year, the City had a carryover of 4,396.89 acre-feet from previous years, and thus had the right to pump 8,846.78 acre-feet. The City pumped 2,842.57 acre-feet of water from the West Coast Groundwater Basin, leaving a balance of 6,364.21 acre-feet of water unused (WRD, 2018). Per the provisions of the adjudication, the City was permitted to carryover 4,449.89 acre-feet of groundwater to the next water year. The remainder of the City's water supply was imported water purchased from the Metropolitan Water District (6,293 acre-feet) and recycled water (834 acre-feet) (WRD, 2018).

The City's UWMP provides projections for water supply and demand for years 2020 through 2040. In 2020, for "Multiple Dry Water Years" (three-year) conditions, it is estimated that the City would have a total water supply (including recycled water) of 11,191 AFY, a total demand of 10,131 AFY, and a surplus of 1,060 AFY. Furthermore, it is forecasted that there would be a water surplus of 1,060 AFY through 2040 with multiple dry year conditions. The City's projected water supplies and demands shown in **Table 3.15-2**.

TABLE 3.15-2
Projected Water Supply and Demand in Multiple Dry Years (AFY)
with proposed TOD Development

	2020	2025	2030	2035	2040
Urban Water Management Plan					
Total Supply	11,191	11,377	11,269	11,160	11,051
Total Demand	10,131	10,317	10,209	10,100	9,991
Surplus	1,060	1,060	1,060	1,060	1,060

Source: City of Inglewood 2016 UWMP

Due to the groundwater basin adjudication, groundwater supplies are actively managed pursuant to regulation that prevent the occurrence of overdraft conditions. Under multiple dry-year conditions, imported supplies can be purchased to meet an annual increase in demand (UWMP, 2016). As a result, the City's UWMP does not anticipate any water supply shortages under multiple dry year scenarios.

Golden State Water Company Water Supply

The Golden State Water Company provides water service to the portion of the Crenshaw/Imperial TOD Plan east of Crenshaw Boulevard and south of Imperial Highway. This area is within Golden State Water Company's Southwest Customer Service Area, which serves 54,994 customers in Southwest Los Angeles County, including all of Gardena and Lawndale, and portions of Carson, Compton, El Segundo, Hawthorne, Inglewood, Redondo Beach, and unincorporated Athens, Del Aire, El Camino Village, Lennox, and Gardena Heights.

Water delivered to customers in the Southwest System is a blend of groundwater pumped from the West and Central Coast Groundwater Basins and imported water from the Colorado River Aqueduct and State Water Project (imported and distributed by Metropolitan Water District of Southern California).

b. Wastewater Collection and Sewage Treatment

The wastewater collection system within the City of Inglewood consists of approximately 145 miles of gravity sewer pipe ranging in size from 4 to 16 inches in diameter and approximately 3,100 manholes. The sewers are primarily constructed of vitrified clay pipe with approximately 95 percent of the pipes sized at 8-inch in diameter. The majority of the existing sewer system was constructed before 1960 (SSMP 2015). Due to the general age of the sewer system, the City is implementing a proactive sewer rehabilitation program that prioritizes and replaces sewer lines that have been identified as deficient, through its sewer inspection program (SSMP 2015). The City inspected 91 miles of sewer lines (62 percent of the system) in 2008 and is initiating a new inspection program for the remaining portion of the sewer system so that needed rehabilitation of sewer lines can be identified. In addition, the City performs video inspection of its entire sewer system every five years.

The general direction of flow is from north to south and east to west. There are approximately 203 connections to the LACSD system throughout the City, which convey City's wastewater to the LACSD Joint Water Pollution Control Plant located in the City of Carson for treatment and disposal (SSMP, 2015). The plant provides primary and secondary treatment and serves a population of approximately 3.5 million people throughout Los Angeles County, including the City of Inglewood. Methane gas generated in the anaerobic digestion process is used to produce power and digester heating steam in a "total energy System" that utilizes gas turbines and waste-heat recovery generators. The onsite generation of electricity permits the plant to produce most of its electricity needs onsite.

The Joint Water Pollution Control Plant facility processes both primary and secondary treatment for an average flow of 280 mgd with a design capacity of 400 mgd (LACSD 2018). Prior to discharge, the treated wastewater is disinfected with hypochlorite and sent to the

Pacific Ocean through a network of outfalls. These outfalls extend 1.5 miles off the coast of Southern California from the Palos Verdes Peninsula to a depth of 200 feet.

c. Drainage Facilities

The main storm drain lines within the TOD Plan areas are owned and maintained by the Los Angeles County Flood Control District (LACFCD) and the City of Inglewood. The City owns and maintains approximately 12 miles of drainage pipelines and 464 catch basins; and the LACFCD has approximately 42 miles of storm drain pipelines and 889 catch basins within the City of Inglewood.

The storm drain main lines within the TOD Plan areas consist of Reinforced Concrete Pipe that varies from 24 to 96-inches in diameter and Reinforced Concrete Box structures. The general topography of the TOD Plan area slopes from north to south and east to west; therefore, the storm drain pipes gravity flow generally from the northeast to southwest, and storm drain pipeline sizes generally increase from north to south.

The City of Inglewood drainage system drains into the various tributaries of each watershed discussed above. Typically, these areas are predominately channelized and highly developed with both commercial and residential properties. Most of the drainage networks are controlled by structural flood control measures, including debris basins, storm drains, underground culverts, and open concrete channels (City 2010).

d. Electrical, Natural Gas, Telecommunications Facilities

Electrical Facilities

As discussed in Section 3.9, *Energy Resources*, electricity within the City is supplied by Southern California Edison (SCE), which serves approximately 59,468 customers/meters in the City (SCE, 2016). In Inglewood's residential neighborhoods, existing electrical facilities largely consist of an overhead electrical system, including poles carrying low voltage conduits along with telecommunication and cable TV facilities. In most of the City's commercial and industrial areas, the existing electrical networks are underground within all the streets (JMC² 2017).

Electricity within TOD Plan areas is primarily used for lighting, cooling, and operation of businesses. Electricity is also used indirectly in the delivery, treatment, and distribution of water used within TOD Plan areas, as well as for the treatment of wastewater.

Natural Gas

As discussed in Section 3.9, *Energy Resources*, Southern California Gas Company (SoCalGas) is the natural gas purveyor within the City. The existing gas lines within the TOD Plan areas range in size from one-inch to 10-inches (JMC² 2017).

In 2014, the Southern California Gas Company developed an implementation plan for the orderly and cost-effective testing and where needed replacement of natural gas transmission pipelines in the system that had not previously been pressure-tested. Since implementation of this plan upgrade, the Southern California Gas Company has replaced or retrofitted equipment and installed mainline valves with the energy-saving technology that allows them to be opened or closed remotely by system operators at a central control location, or that automatically shuts off the flow of natural gas in the event of a large pressure drop (SCG, 2016).

Recent natural gas infrastructure improvements near the TOD Plan areas include pipeline replacement within Crenshaw Boulevard near Manchester Boulevard and Florence Avenue and hydrostatic pressure testing of existing pipelines (SCG, 2016).

The Southern California Gas Company expects its active meters to grow an average of 0.8 percent annually from 2013 through 2035. However, the Gas Company projects total gas demand to decline at an annual rate of 0.33 percent from 2013 to 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency standards and programs, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to “Advanced Metering Infrastructure” (CGEU, 2014).

Telecommunications

The Telecommunications Division of the Information Technology and Communications Department is responsible for all of the voice-related services for the City of Inglewood. There are 22 locations, both large and small which require service from the Telecommunications staff. Moreover, the Telecommunications Division has over 1,100 phones, 850 voice mailboxes, and many incoming and outgoing lines, which provide service to the citizens of Inglewood. Additionally, Spectrum Business is the primary cable provider in the area and may provide telecommunication services to the proposed Project. Telecommunications cable lines within the within the TOD Plan areas have been installed in the same utility trenches as undergrounded electrical service.

e. Non-Hazardous Solid Waste Management

Consolidated Disposal Service (CDS) provides solid waste collection and recycling services within the City of Inglewood. Solid waste is collected and taken to CDS’s American Waste

Transfer Station at 1449 W. Rosecrans Ave, in Gardena, and then transported to the Sunshine Canyon Landfill. The Transfer Station has a 4,032-ton per day permitted capacity and a maximum permitted processing of 2,225 tons per day. The transfer station receives an average of 1,600 to 1,800 tons of solid waste per day.

The Sunshine Canyon Landfill has a maximum permitted capacity of 12,100 tons per day takes in an average of 7,582 tons per day (County 2014); the Landfill is projected to remain open until 2037 (CalRecycle 2016). In addition to this landfill, other facilities that could serve Inglewood, including TOD Plan areas are listed below in **Table 3.15-3**.

TABLE 3.15-3
Capacity of Landfills in the Region

Landfill	Distance from Inglewood	Maximum Permitted Daily Tons	Average Daily Tonnage (2016)	Remaining Average Daily Capacity 2016 (Tons)	Remaining Permitted Capacity (Tons)	Expected Closure
Calabasas Landfill	35 miles	3,500	951	2,549	5,951,595	2036
Savage Canyon Landfill	25 miles	350	293	57	4,894,183	2055
Simi Valley Landfill & Recycling Center	40 miles	6,000	2,442	3,558	119,000,000	2052
Sunshine Canyon Landfill	30 miles	12,100	7,496	4,604	62,108,650	2037

Source: 2016 Annual Report Los Angeles County Countywide Integrated Waste Management Plan.

3.15.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of utilities, service systems, and water supply impacts. Based on Appendix G of the CEQA Guidelines the proposed project would have a significant effect if it were to:

Threshold UTI-1: Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects;

Threshold UTI-2: Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;

Threshold UTI-3: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve

the project's projected demand in addition to the provider's existing commitments;

Threshold URI-4: Generate solid waste in excess of State or local standards or the capacity of the landfill serving the project or other local infrastructure, or otherwise impair the attainment of solid waste reduction goals;

Threshold UTI-5: Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

3.15.5 IMPACTS AND MITIGATION MEASURES

Threshold UTI-1: Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects.

Impact UTI-1.1: Construction of needed water infrastructure would not result in physical environmental effects other than those that would occur as the result of development of proposed uses and improvements within rights-of-way needed for connections to existing water lines adjacent to site-specific development projects. Connections to existing water lines would occur exclusively within existing roadway and alley rights-of-way. While such connections might require roadway lane closures during construction, such closures would be temporary and subject to standard City requirements to ensure public safety and minimal disruption of roadway operations. As a result, impacts related to construction of water facilities would be *less than significant*.

Methodology

From the estimated increase in water demand, availability of existing water supply entitlements, and existing water infrastructure, an analysis of infrastructure improvements that would be necessary to provide water service to the TOD Plan areas over the life of the proposed Plans was undertaken. Based on that analysis, if construction or expansion of water facilities would be necessary, an evaluation of the physical environmental effects of such improvements was undertaken to determine whether those effects would be considered significant.

Impact Assessment

Within the TOD Plan areas, water lines are located in almost all streets and alleys and range in size from 4- to 16-inches in diameter. Almost all the existing water lines are older water pipes made of asbestos cement, with some relatively new water lines that were installed in recent years, made of cast iron, pvc, copper, corrugated metal, and steel.

The Existing Infrastructure Baseline Data for the TOD Plan report (JMC, 2017) identifies the existing infrastructure in the TOD Plan areas and did not identify any needs for water infrastructure improvements or expansion to accommodate build out of the proposed TOD Plans. However, implementation of site-specific development projects permitted by the TOD Plans would include installation of onsite water infrastructure and new connections to the water distribution system that could include improvements to the water distribution lines and other connecting infrastructure that would be sized to accommodate the increased water demand of new development. Because the existing lines are generally old and consist of asbestos cement, the increased density of new development proposed by the TOD Plans could result in the need to improve existing water distribution lines within the alleys and street rights-of-way that connect to new developments. Water supply design specifications for each future site-specific development project permitted by the TOD Plans would comply with the City of Inglewood standards (per the California Building Code) regarding requirements for design and operation of water distribution facilities.

Under the City's normal development review procedure for site-specific development projects, the City determines the actual water system design requirements of each site-specific development project, and the needs for any improvements to the existing water supply infrastructure would be identified and required by the City construction permit. The temporary construction of needed water system improvements would occur along existing pipeline alignments and within existing streets, alleys, rights-of-way, and construction sites and would be required to comply with all City standards regarding construction noise, air quality and dust suppression mitigation requirements, erosion control (through the required SWPPP) and temporary construction traffic controls. These standard requirements would ensure that potential construction impacts related to water line improvements remain less than significant. As a result, potential impacts related to build out of the proposed TOD Plans would not result in construction of new or expanded water facilities that would result in a significant environmental effect.

Significance Conclusion for Impact UTI-1.1

Construction of needed water infrastructure would not result in any physical environmental effects other than those that would occur as the result of development of proposed uses and improvements within rights-of-way needed for connections to existing water lines adjacent to

site-specific development projects. While the connections to existing water lines might require roadway lane closures during construction, such closures would be temporary and subject to standard City requirements for utility work within road rights-of-way to ensure public safety and minimal disruption of roadway operations. As a result, impacts related to construction of water facilities would be less than significant.

Threshold UTI-1: Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects.

Impact UTI-1.2: Site-specific development projects permitted by the proposed TOD Plans would generate a net increase of 0.90 mgd of sewage, which represents 0.75 percent of the remaining 120 mgd capacity of the LACSD's Joint Water Pollution Control Plant. Thus, adequate capacity would be available, and the TOD Plans would not require expansion of existing or construction of new wastewater treatment facilities. Construction of needed sewer infrastructure would not result in any on-site physical effects on the environment other than those analyzed as part of development of proposed residential and commercial uses (e.g., site grading). In addition, any necessary off-site sewer improvements would occur exclusively within existing rights-of-way adjacent to site-specific developments. While such connections might require roadway lane closures during construction, such closures would be temporary and subject to standard City requirements to ensure public safety and minimal disruption of roadway operations. As a result, impacts related to construction of sewer facilities would be *less than significant*.

Methodology

The analysis of the proposed TOD Plans' impact related to wastewater facilities identifies the increased amount of wastewater that would be generated by buildout of the TOD Plans and the capacity of the wastewater infrastructure serving the TOD Plan areas. The net increase in development that would occur under the TOD Plans was multiplied by the City's wastewater generation rates identified in Municipal Code Section 10-89 to determine the net increase in wastewater generation that would occur as the result of the proposed TOD Plan. The resulting increase in wastewater generation was compared with the available capacity of the infrastructure serving the TOD Plan areas. If infrastructure capacity would be exceeded, the

physical impacts of constructing needed wastewater system improvements would be evaluated in relation to the physical environmental effects analyzed in this EIR to determine whether construction of wastewater system improvements would have significant environmental effects other than the physical environmental effects analyzed for proposed development throughout this EIR.

Impact Assessment

The proposed TOD Plan would result in an increase of 4,090 residential units and 705,968 square feet of non-residential uses, which as shown in **Table 3.15-6**, would result in an approximate 0.90 mgd increase in wastewater generation. As previously described, the Existing Infrastructure Baseline Data for the TOD Plan report (JMC, 2017) did not identify any needs for infrastructure improvements or expansion to the City's sewer system to accommodate build out of the proposed TOD Plans. However, due to the general age of the sewer system, the City is implementing a proactive sewer rehabilitation program that evaluates age and infrastructure and prioritizes and replaces sewer lines as appropriate.

TABLE 3.15-6
Projected Increase in Wastewater Generation at Build Out

Proposed Land Uses	Generation Rate Per Day ¹	Net Change in Development at Buildout	Increase in Wastewater Generation Per Day
Residential	200 gallons per dwelling unit	4,090 units	818,000 gallons
Retail	100 gallons per 1,000 square feet	59,439 square feet	5,944 gallons
Office	200 gallons per 1,000 square feet	1,277,181 square feet	255,436 gallons
Hotel Rooms	200 gallons per room	-18 rooms	-3,600 gallons
Institutional	200 gallons per 1,000 square feet	-118,131 square feet	-23,626 gallons
Industrial	600 gallons per 1,000 square feet	-253,639 square feet	-152,183 gallons
Total Increased Wastewater Generation			899,971 gallons (0.90 mgd)

Source: Arroyo Group, 2017.

¹ Per Municipal Code Section 10-89.

The TOD Plans would increase the intensity of land uses within the TOD Plan areas, and future site-specific development projects would install onsite sewer infrastructure and new connections to the sewer system that could include improvements to aged sewer pipelines and other connecting infrastructure. Such improvements would be required to be sized to accommodate the wastewater generation of such new development. Because the existing pipelines are generally from the 1960s, new development could result in the need to improve existing sewer lines within street and alley rights-of-way that connect to future site-specific development projects.

Under the City's development review procedures for site-specific development projects, the City determines sewer system design requirements and the needs for any improvements to existing infrastructure that would be required by the City's construction permit and referenced directly in the design plans for the proposed development to assure adequate capacity (SSMP, 2015). The sewer design specifications for each site-specific development project would be required to comply with City standards (per the California Building Code) regarding requirements for design and operation of sewer distribution facilities.

The construction of any needed wastewater system improvements as part of future site-specific development projects permitted by the proposed TOD Plans would generally occur along existing pipeline alignments and within existing streets, alleys, rights-of-way, and construction sites, and would be required to comply with all Inglewood Municipal Code standards and EIR mitigation measures regarding construction noise, air quality and dust suppression, erosion control (through the required SWPPP), and temporary construction traffic controls. As a result, potential impacts related to build out of the proposed TOD Plan would not result in construction of new or expanded wastewater facilities that could result in a significant environmental effect.

Significance Conclusion for Impact UTI-1.2

Construction of needed sewer infrastructure would not result in any on-site physical effects on the environment other than those that would occur as the result of development of proposed residential and commercial uses (e.g., site grading) as analyzed throughout this EIR. In addition, off-site connections to existing sewer lines would occur exclusively within existing road and alley rights-of-way. While such connections might require roadway lane closures during construction, such closures would be temporary and subject to standard City requirements for utility work within rights-of-way to ensure public safety and minimal disruption to roadway operations. As a result, impacts related to construction of sewer facilities would be less than significant.

Threshold UTI-1: Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects.

Impact UTI-1.3: New development that would be permitted by the proposed TOD Plans would be required to provide for detention and infiltration of stormwater pursuant to SUSMP and LID regulations that are designed to reduce and manage stormwater drainage. The SUSMP requires site-specific development projects to conduct a

drainage hydrologic/hydraulic analysis and detail the project's anticipated runoff. From this analysis, site-specific development projects are required to ensure that a net increase in peak stormwater flows would not occur. Site-specific development projects are also required through implementation of project-specific WQMPs to detain and treat the storm water quality volume generated by the project. In addition, Inglewood Municipal Code Section 10-208 requires LID standards to reduce runoff through smart growth practices, such as stormwater infiltration, evapotranspiration, biofiltration, and rainfall harvest and use. As a result, no impacts related to construction of drainage facilities would occur.

Methodology

An evaluation of the physical environmental effects of proposed drainage improvements was undertaken to determine whether those effects would be considered significant in relation to the physical environmental effects analyzed throughout this EIR.

The analysis of the proposed TOD Plans' impact related to storm water drainage facilities considers whether changes in the amount of runoff generated from site-specific development permitted by the proposed TOD Plans could require construction of new or expanded stormwater facilities. The analysis also considers the ability of existing drainage infrastructure to serve the increased intensity of development proposed by the TOD Plans. Should construction or expansion of existing stormwater drainage facilities be required, the physical impacts of constructing needed stormwater system improvements would be evaluated in relation to the physical environmental effects analyzed throughout this EIR to determine whether construction of stormwater drainage improvements would have significant environmental effects.

Should construction or expansion of existing stormwater drainage facilities be required, a significant impact would result if the physical environmental effects of constructing such needed stormwater system would be significant. Should no improvements to the drainage system be needed from build out of the proposed TOD Plans, then no impacts would result.

Impact Assessment

The TOD Plans encompass developed urban areas that are primarily covered with impervious surfaces. No surface streams or rivers pass through either TOD Plan area. Stormwater run-off primarily sheet flows across impervious surfaces or developed properties and is collected by curbs and gutters and conveyed to underground storm drains.

The site-specific commercial, residential, and mixed-use development projects that would be permitted by the TOD Plans would generally have a similar amount of impervious surfaces as the existing uses they would replace and would therefore not generate an increase in the amount of runoff. A small number of currently vacant sites with pervious surface areas would be developed pursuant to the proposed TOD Plans, which would increase impervious surface areas on those sites and increase stormwater runoff from those sites.

New development pursuant that would be permitted by the proposed TOD Plans would be required to provide for detention and infiltration of stormwater pursuant to SUSMP and LID regulations required in the City of Inglewood that are designed to reduce and manage stormwater drainage. The SUSMP requires site-specific development projects to conduct a drainage hydrologic/hydraulic analysis and detail the project's anticipated runoff. From this analysis, site-specific development projects are required to ensure that a net increase in peak stormwater flows would not occur. Development projects are also required through implementation of project-specific WQMPs to detain and treat the storm water quality volume generated by the project. In addition, Inglewood Municipal Code Section 10-208 requires LID standards to reduce runoff through smart growth practices, such as stormwater infiltration, evapotranspiration, biofiltration, and rainfall harvest and use.

Site-specific development projects within the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas would also be required to install landscaping along streets, increasing the amount of pervious surface areas within the TOD Plan areas' roadway rights-of-way. These vegetated areas would help capture, detain, and utilize some surface water runoff for irrigation, which would reduce the amount of surface runoff in the storm drain pipelines.

Significance Conclusion for Impact UTI-1.3

Because new development pursuant that would be permitted by the proposed TOD Plan would be required to provide for detention and infiltration of stormwater pursuant to SUSMP and LID regulations such that no net increase in peak stormwater flows would occur, construction of new or expanded stormwater drainage facilities that could cause significant environmental effects would not be needed. As a result, no impacts related to stormwater drainage infrastructure would occur.

Threshold UTI-1: **Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects.**

Impact UTI-1.4: **Construction of needed electrical, natural gas, and telecommunications facilities improvements to serve site-specific**

development and infrastructure projects would not result in any on-site physical effects on the environment other than those that would occur as the result of the development of proposed residential and commercial uses (e.g., site grading) and infrastructure improvements as analyzed throughout this EIR. In addition, off-site connections to existing electrical, natural gas, and telecommunications facilities would occur exclusively within existing road and alley rights-of-way. While such connections might require roadway lane closures during construction, such closures would be temporary and subject to standard City requirements for utility work within rights-of-way to ensure public safety and minimal disruption to roadway operations. As a result, impacts related to construction of electrical, natural gas, and telecommunications facilities would be *less than significant*.

Methodology

The analysis of the proposed TOD Plans' impact related to electrical, natural gas, and telecommunications facilities considers whether the increased development intensity would require construction of new or expanded facilities. Should construction or expansion of existing electrical, natural gas, or telecommunications facilities be required, the physical impacts of constructing needed facilities improvements would be evaluated in relation to the physical environmental effects analyzed throughout this EIR to determine whether construction of electrical, natural gas, or telecommunications facilities improvements would have significant environmental effects.

Should construction or expansion of existing electrical, natural gas, or telecommunications facilities be required, a significant impact would result if the physical environmental effects of constructing such needed improvements would be significant. Should no improvements to the drainage system be needed from build out of the proposed TOD Plans, then no impacts would result.

Impact Assessment

Installation of electrical, natural gas, or telecommunications facilities to serve new uses would be required to provide connections from site-specific development projects to the existing service network available within roadway rights-of-way throughout the TOD Plan areas. Such improvements would correspond with proposed roadway improvements and site-specific building construction. Any new electrical, natural gas, or telecommunications facilities upgrades needed to serve individual buildings within the TOD Plan areas would be

constructed underground. The final design and composite plans would be coordinated during the site-specific development design process with SCE, the Southern California Gas Company, and the City of Inglewood/cable provider for electrical, natural gas, and telecommunications facilities, respectively.

Significance Conclusion for Impact UTI-1.4

Construction of needed electrical, natural gas, and telecommunications facilities improvements to serve site-specific development and infrastructure projects would not result in any on-site physical effects on the environment other than those that would occur as the result of the development of proposed residential and commercial uses (e.g., site grading) and infrastructure improvements as analyzed throughout this EIR. In addition, off-site connections to existing electrical, natural gas, and telecommunications facilities would occur exclusively within existing road and alley rights-of-way. While such connections might require roadway lane closures during construction, such closures would be temporary and subject to standard City requirements for utility work within rights-of-way to ensure public safety and minimal disruption to roadway operations. As a result, impacts related to construction of electrical, natural gas, and telecommunications facilities would be less than significant.

Threshold UTI-2: Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

Impact UTI-2: New residential, commercial, and employment-generating development permitted by the proposed TOD Plans would increase long-term water demand within the service areas of both the City of Inglewood and Golden State Water Company. While the City projects a surplus of entitled water supply during multiple dry years in 2040 even with development of the TOD Plans, the Golden State Water Company projects sufficient entitled water supply during multiple dry years in 2040 to meet projected demands but no additional capacity to serve the Crenshaw/Imperial TOD Plan. However, because the City projects a surplus water supply of approximately 470 AFY by 2040, sufficient water supplies would be available to serve the proposed TOD Plans from existing entitlements and resources, and new or expanded entitlements would not be required. As a result, impacts related to water supplies would be *less than significant*.

Methodology

The analysis in this section focuses on the nature and magnitude of the change in levels of water use from build out of the TOD Plans. The primary resources used for this analysis include the City's 2015 UWMP and the Draft 2015 Water Master Plan for those portions of the TOD Plan areas served by the City of Inglewood and the Golden State Water Company's July 2016 Southwest Urban Water Management Plan prepared for its Southwest customer Service Area which includes the portion of the Crenshaw/Imperial TOD Plan area within the southeast quadrant of the Crenshaw Boulevard/Imperial highway intersection.

To determine whether a significant impact would exist, the projected increase in water demand over the 20-year horizon of the TOD Plans was compared to future available supplies from existing City and Golden State Water Company entitlements and resources, including projected availability of groundwater supplies and water supply from MWD. If the projected water demand that would result from buildout of the TOD Plans would exceed existing water entitlements and resources of either the City or Golden State Water Company, and new or expanded water supply entitlements would be required, a significant impact related to water supply would occur.

Impact Assessment

Water Demand

Build out of the proposed TOD Plan would result in additional residential, commercial, office, institutional, and industrial uses, which would increase water demand above existing conditions. Based on the water demand factors from the City of Inglewood Draft 2015 Water Master Plan, it is estimated that new land uses anticipated to occur under the proposed TOD Plan would increase water demand by 874.6 AFY (see **Table 3.15-4**).

Reliability of Water Supply

City of Inglewood Service Area

The City's UWMP provides projections for water supply and demand for years 2020 through 2040. In 2020, for "Multiple Dry Water Years" (three-year) conditions, it is estimated that the City would have a total water supply (including recycled water) of 11,191 AFY, a total demand of 10,131 AFY, and a surplus of 1,060 AFY. Furthermore, it is forecasted that there would be a water surplus of 1,060 AFY through 2040 with multiple dry year conditions.

As shown in **Table 3.15-5**, development of the proposed TOD Plans would result in a surplus of approximately 470 AFY by 2040 under the City's existing pumping and entitled amounts.

Therefore, sufficient water supplies would be available to serve the proposed TOD Plans from existing entitlements and resources, and new or expanded entitlements would be required.

TABLE 3.15-5
Projected Increase in Water Demand from Buildout of the Proposed TOD Plans,
City of Inglewood (City) and Golden State Water Company Service Areas

Proposed Land Uses	Demand Rate Per Day ¹	Net Increase in Development at Build out ²	Increase in Water Demand Per Day
Multi-Family Residential	160 gallons per dwelling unit	TOD Plans Total: 4,090 du's City Service Area: 3,054 du's GSWC Service Area: 1,036 du's	654,400 gallons 488,640 gallons 165,760 gallons
Retail	205 gallons per 1,000 square feet	TOD Plans Total: 59,439 s.f. City Service Area: 176,888 s.f. GSWC Service Area: -117,449 s.f.	12,185 gallons 36,262 gallons -24,077 gallons
Office	60 gallons per 1,000 square feet	TOD Plans Total: 1,277,181 s.f. City Service Area: 1,367,533 s.f. GSWC Service Area: -90,352 s.f.	76,631 gallons 82,050 gallons -5,421 gallons
Hotel Rooms	125 gallons per room	TOD Plans Total: -18 rooms City Service Area: -18 rooms GSWC Service Area: N/A	- 2,250 gallons - 2,250 gallons N/A
Institutional	200 gallons per 1,000 square feet	TOD Plans Total: - 118,131 s.f. City Service Area: - 118,131 s.f. GSWC Service Area: N/A	-23,626 gallons -23,626 gallons N/A
Industrial	220 gallons per 1,000 square feet	TOD Plans Total: -253,639 s.f. City Service Area: -253,639 s.f. GSWC Service Area: N/A	-55,801 gallons -55,801 gallons N/A
Total Increased Water Demand		TOD Plans: City Service Area: GSWC Service Area:	654,400 gallons 742.44 (AFY) 525,997 gallons 589.68 (AFY) 136,262 gallons 152.76 (AFY)

¹ Draft 2015 Water Master Plan, City of Inglewood.

² Source for land use estimates: Arroyo Group, 2018.

TABLE 3.15-6
Projected Water Supply and Demand in Multiple Dry Years (AFY)
with proposed TOD Development – City of Inglewood Service Area

	2020	2025	2030	2035	2040
Urban Water Management Plan					
Total Supply	11,191	11,377	11,269	11,160	11,051
Total Demand	10,131	10,317	10,209	10,100	9,991
Surplus/(Deficit) before TOD Plans	1,060	1,060	1,060	1,060	1,060
Westchester/Veterans and Crenshaw/Imperial – City of Inglewood Service Area	58.97	235.87	442.26	530.71	589.68
Surplus/(Deficit) with TOD Plans	1,001.03	824.13	617.74	529.29	470.32

Source: The Arroyo Group 2017; City of Inglewood 2016 UWMP

Golden State Water Company Service Area

Golden State Water Company's UWMP provides projections for water supply and demand for years 2020 through 2040. In 2020, for "Multiple Dry Water Years" (three-year) conditions. The UMWP projects that the Company's Southwest Service Area's total projected water supply (including recycled water) Southwest Service Area would match its total projected water demand with no surplus for additional projected water demand under multiple dry year conditions.

As shown in **Table 3.15-6**, Golden State Water Company's projected 2020-2040 water supply for multiple dry years tracks the Company's projected water demand and does not provide for additional growth. Thus, no assured water supply for multiple dry years can be identified for the portion of the Crenshaw/Imperial TOD Plan area being served by the Golden State Water Company at least until such time as the Golden State Water Company might update its UWMP to include additional long-term water supply should the Crenshaw/Imperial TOD Plan be approved. However, as noted in **Table 3.15-5**, the City of Inglewood projects a surplus of approximately 470 AFY by 2040 under the City's existing pumping and entitled amounts during multiple dry years. Therefore, sufficient water supplies would be available to serve the proposed TOD Plans from existing entitlements and resources, and new or expanded entitlements would not be required.

Significance Conclusion for Impact UTI-2

Because proposed development would consume more water annually than the City's 2015 Urban Water Management Plan identifies as being available to the City of Inglewood, water

**TABLE 3.15-7: PROJECTED WATER SUPPLY AND DEMAND IN MULTIPLE DRY YEARS (AFY)
GOLDEN STATE WATER COMPANY SERVICE AREA**

	2020	2025	2030	2035	2040
Urban Water Management Plan					
Total Supply	33,072	33,492	33,915	33,345	34,779
Total Demand	33,072	33,492	33,915	33,345	34,779
Surplus/(Deficit) before TOD Plans	0.00	0.00	0.00	0.00	0.00
Westchester/Veterans and Crenshaw/Imperial – Golden State Water Company Service Area	15.28	61.10	114.57	137.48	152.76
Surplus/(Deficit) with TOD Plans	(15.28)	(61.10)	(114.57)	(137.48)	(152.76)

Source: The Arroyo Group 2017; Golden State Water Company 2015 UWMP Southwest, July 2016.

supplies are not adequate to meet projected demands in normal, dry, and multiple dry years through 2040, a significant impact would result, and mitigation is required.

New residential, commercial, and employment-generating development permitted by the proposed TOD Plans would increase long-term water demand within the service areas of both the City of Inglewood and Golden State Water Company. While the City projects a surplus of entitled water supply during multiple dry years in 2040 even with development of the TOD Plans, the Golden State Water Company projects sufficient entitled water supply during multiple dry years in 2040 to meet projected demands but no additional capacity to serve the Crenshaw/Imperial TOD Plan. However, because the City projects a surplus water supply of approximately 470 AFY by 2040, sufficient water supplies would be available to serve the proposed TOD Plans from existing entitlements and resources, and new or expanded entitlements would not be required. As a result, impacts related to water supplies would be less than significant.

Threshold UTI-3: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Impact UTI-3: Site-specific development projects permitted by the proposed TOD Plans would generate a net increase of 0.90 mgd of sewage, which represents 0.75 percent of the remaining 120 mgd capacity of the LACSD's Joint Water Pollution Control Plant. Thus,

adequate capacity would be available. and the impact would be less than significant.

Methodology

The analysis of the proposed TOD Plans' impact related to wastewater treatment facilities identifies the increased amount of wastewater that would be generated by buildout of the TOD Plans and the capacity of the wastewater treatment facilities serving the TOD Plan areas. The net increase in development that would occur under the TOD Plans was multiplied by the City's wastewater generation rates identified in Municipal Code Section 10-89 to determine the net increase in wastewater generation that would occur as the result of the proposed TOD Plan. The resulting increase in wastewater generation was compared with the available capacity of the wastewater treatment facilities serving the TOD Plan areas. If treatment capacity would be exceeded, a significant impact would result.

Impact Assessment

The proposed TOD Plan would result in an increase of 4,090 residential units and 705,968 square feet of non-residential uses, which as shown in **Table 3.15-6**, would result in an approximate 0.90 mgd increase in wastewater generation. The Los Angeles County Sanitation Districts' Joint Water Pollution Control Plant provides both primary and secondary treatment for an average flow of 280 mgd and a design capacity of 400 mgd (LACSD, 2018). Due to the plant's excess capacity (120 mgd), adequate capacity would be available to accommodate the increase in wastewater flow from buildout of the proposed TOD Plans (0.90 mgd), which represents 0.75 percent of the remaining treatment plant capacity.

Significance Conclusion for Impact UTI-3

The proposed TOD Plans would generate a net increase of 0.90 mgd of sewage, which represents 0.75 percent of the remaining 120 mgd capacity of the LACSD's Joint Water Pollution Control Plant. Thus, the proposed TOD Plans would not result in inadequate capacity of the wastewater treatment plant to serve site-specific development projects permitted by the TOD Plans in addition to existing service commitments. Impacts would be less than significant.

Threshold UTI-4: Generate solid waste in excess of State or local standards or the capacity of the landfill serving the project or other local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

Impact UTI-4: Demolition and construction activities would generate a daily average of 4.2 tons of solid waste for landfill disposal. After completion of construction, the TOD Plans will increase the

amount of solid waste delivered to landfills by 6.8 tons daily (maximum daily generation of 10.66 tons of solid waste for landfill disposal from the combination of demolition, construction, and operations in the last year of development).

Demolition and construction activities would generate a total of 26,467 tons of solid waste for landfill disposal over the estimated 20-year construction period. A net increase of 42,568 tons of solid waste for landfill disposal by 20 years from the increased land use intensity proposed by the TOD Plans.

Adequate landfill capacity exists on both a daily and long-term basis to accommodate increased solid waste for landfill disposal generated in the TOD Plan areas. Impacts related to landfill capacity would therefore be *less than significant*.

Methodology

The analysis of the proposed TOD Plans' impact on landfill facilities identifies changes in the amount of solid waste that would be generated during construction and operation of site-specific developments within the TOD Plan areas. The analysis identifies the anticipated amount of non-hazardous construction debris and operational solid waste that would be generated from the TOD Plan areas and the amount that would be disposed of in landfills after compliance with applicable recycling/diversion requirements. It was assumed that demolition and construction activities would occur throughout implementation of the 20-year plan.

Solid waste generation after recycling/diversion was compared with the available capacity of the landfill serving the TOD Plan areas to assess the significance of the TOD Plans' solid waste generation during construction and at build out. Impacts were considered significant if the site-specific developments that would be permitted by the TOD Plans would exceed available landfill capacity.

Impact Assessment

Solid Waste Generated by Demolition and Construction

The proposed TOD Plans would result in the future demolition of 120 residential units and 1,128,519 square feet of non-residential uses. In addition, buildout of the TOD Plans would result in a construction of 4,210 new dwelling units (net increase of 4,090 units) and 1,834,486 square feet of new of non-residential uses (net increase of 705,968 square feet). Demolition and construction activities would occur over an anticipated 20-year period.

Demolition and construction activities generate solid waste, including cardboard, wood, metals, glass, plastics, concrete, asphalt, and other building materials. The average estimate of overall demolition waste from residential development is 111.3 pounds per square foot and construction waste from new residential development is 4.38 pounds per square foot. Demolition of non-residential uses is estimated to generate 137 pounds per square foot, and construction waste for non-residential is estimated to be 4.02 pounds per square foot (USEPA 1998).

As shown in **Table 3.15-7**, it is estimated that demolition and construction activities within the TOD Plan areas would generate 8,374 pounds (4.2 tons) of solid waste daily that would go to landfills, based on the required solid waste diversion rates set forth in AB 341, which will be mandatory starting in (based on a 6 day per week construction and landfill disposal schedule).

Solid Waste Generated by New Development Permitted by the TOD Plans

TOD Plan buildout would result in a net increase of 4,090 residential units and 705,968 square feet of non-residential use and increase generation of solid waste. As shown in **Table 3.15-8**, buildout of the proposed TOD Plans would increase solid waste generation by an estimated 54,256 pounds (27.1 tons) per day. Based on the current recycling requirements, this would result in 13.6 tons of solid waste from operation of the proposed TOD Plan areas at build out. In 2020, when AB 341 becomes effective diversion of 75 percent of solid waste from landfills would be required, and solid waste landfill disposal from operation of the TOD Plan areas at build out would be reduced to approximately 6.8 tons per day.

Significance Conclusion for Impact UTI-4

Daily Landfill Disposal Capacity

As shown in **Table 3.15-7**, demolition and construction activities are estimated to generate a daily average of 8.4 tons of solid waste for landfill disposal prior to 2020 and a daily average of 4.2 tons of solid waste for landfill disposal after 2020. As shown in **Table 3.15-8**, at buildout, the proposed TOD Plans will increase the amount of solid waste delivered to landfills by 6.8 tons daily. The maximum daily generation of solid waste resulting from the proposed TOD Plans would occur in the final year of projected development when the TOD areas would generate a total daily average of 10.66 tons of solid waste for landfill disposal (4.2 tons from demolition and construction activities and 6.46 tons from operations).

Waste generated within the TOD Plan areas would be hauled to the American Waste Transfer Station and then transported to the Sunshine Canyon Landfill for disposal. As described above, the Sunshine Canyon Landfill has a maximum permitted capacity of 12,100 tons per day takes

in an average of 7,582 tons per day, resulting in an available daily capacity of 4,518 tons (County, 2014).

TABLE 3.15-8
Estimated Demolition and Construction Solid Waste

	Amount of Demolition	Demolition Waste (Pounds Per SF)	Demolition Waste (pounds)	Amount of Construction	Construction Waste Pounds Per SF ¹	Construction Waste (pounds)	Demolition and Construction Waste (pounds)
Residential	120 units	111.3	20,034,000	4,210	4.38	27,659,700	47,693,700
Non-Residential	1,128,519 sf	137	154,607,103	1,834,486	4.02	7,374,634	161,981,737
Total Waste			174,641,103			35,034,334	209,675,437
Annual Waste Generation							
Pounds			8,732,055			1,751,717	10,483,772
Tons			4,366			876	5,242
Daily Solid Waste Generation²							
Pounds			27,898			5,597	33,495
Tons			13.9			2.8	16.7
Daily Solid Waste to Landfills Per Current Regulations							
Pounds			13,949			2,798	17,748
Tons			7.0			1.4	8.4
Daily Solid Waste to Landfills in 2020 Per AB 341							
Pounds			6,972			1,399	8,374
Tons			3.5			0.7	4.2

Source: USEPA 1998.

SF = Square Feet.

¹ = Average residential square footage of 1,500

² = Based on a 6 day per week landfill schedule

TABLE 3.15-9
Increased Solid Waste Generation from New Uses Permitted by the TOD Plans at Build Out

	Generation Factor ^{1,2}	Net Increase in Development	Net Increase in Solid Waste Generation
Residential	12.23 lbs/du/day	4,090 dwelling units	50,020 lbs/day
Non-Residential	6 lbs/1,000 sf/day	705,968 square feet	4,236 lbs/day
Total Solid Waste Generation			54,256 lbs/day 27.1 tons/day
Daily Landfill Disposal Per Current Required Diversion Rate			NA³
Daily Landfill Disposal in 2020 Per AB 341 Required Diversion Rate			6.8 tons/day
<p>¹ Derived from a list of generation rates maintained by CalRecycle of a variety of generation rate sources at http://www.calrecycle.ca.gov/WASTECHAR/WasteGenRates/default.htm. CalRecycle does not provide standard solid waste generation rates by land use.</p> <p>² These factors are estimates prior to recycling, composting or other waste diversion programs.</p> <p>³ AB 341-required solid waste diversion rates will apply to all but the first year of operations of new uses within the TOD Plan areas. Thus, at buildout, all development within the TOD Plan areas will be subject to the 75 percent diversion rate required by AB 341.</p>			

The additional solid waste that would be generated by the TOD Plan areas would be well within the daily tonnage accepted by the landfill for demolition and construction activities, as well as for ongoing operations.

In addition, as shown above in **Table 3.15-3**, there are several other landfills with available capacity to be used for disposal of solid waste that would be generated by the TOD Plans.

Therefore, the increase in solid waste delivered to landfills as the result of the proposed TOD Plans would not exceed existing daily landfill capacity.

Long-Term Landfill Capacity

Demolition and construction activities within the TOD Plan areas would generate a total of 26,467 tons of solid waste for landfill disposal over the estimated 20-year construction period. Twenty years of solid waste generation by the total amount of increased land uses permitted by the TOD Plans would generate 42,568 tons of solid waste for landfill disposal.

As indicated in **Table 3.15-3**, Sunshine Canyon Landfill has a remaining permitted capacity of 62,108,650 tons. Sunshine Canyon Landfill is anticipated to close in 2037. Two additional landfills indicated in **Table 3.15-3** (Savage Canyon and Simi Valley) have a total of 123,894,183 tons of remaining permitted capacity and are not expected to close until the early 2050s.

Thus, there is adequate landfill capacity on both a daily and long-term basis for the increased solid waste that would be generated by the increased development permitted by the proposed TOD Plans. Impacts related to landfill capacity would therefore be less than significant.

Threshold UTI-5: Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Impact UTI-5: Land uses within the proposed TOD Plan areas would be required to comply with City waste diversion programs and would not conflict with federal, state, or local statutes or regulations related to solid waste. Therefore, no adverse physical environmental effects would result, and no impacts related to solid waste regulations would occur.

Methodology

The analysis related to solid waste regulations identifies the non-hazardous solid waste that is anticipated to be generated during both construction and operation of the TOD Plans, and the ways in which the TOD Plans would implement regulations related to disposal of that solid waste.

Impacts would be considered significant if implementation of the TOD Plans would fail to comply or would be in conflict with federal, state, or local statutes or regulations related to solid waste, such that an adverse physical effect on the environment could result.

Impact Assessment

The proposed TOD Plans would result in new site-specific development that would generate an increased amount of solid waste. All solid waste-generating and management activities within the City of Inglewood are subject to the requirements set forth in AB 939, as well as Article 7 of the Inglewood Municipal Code that currently require diversion of a minimum of 50 percent of construction and demolition debris, as well as all other solid waste. In addition, after 2020 site-specific development projects permitted by the TOD Plans would be required to divert 75 percent of solid waste. Because site-specific development projects permitted by the TOD Plans would be part of the citywide solid waste management programs that ensure diversion consistent with state regulations and the Inglewood Municipal Code, site-specific development permitted by the TOD Plans will comply with federal, state, and local statutes and regulations related to solid waste. All site-specific development projects in the City undergo development review, which includes an analysis of project compliance with these requirements.

Significance Conclusion for Impact UTI-8

Land uses within proposed TOD Plan areas would be required to comply with City waste diversion programs and would not conflict with federal, state, or local statutes or regulations related to solid waste. Therefore, no adverse physical environmental effects would result, and no impacts related to solid waste regulations would occur.

3.15.5 REFERENCES - UTILITIES, SERVICE SYSTEMS, AND Water Supply

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3.16 RECREATIONAL RESOURCES

3.16.1 INTRODUCTION

a. Overview

This section of the EIR analyzes whether the proposed TOD Plans for the Westchester/Veterans and Crenshaw/Imperial areas would (1) increase the use of existing parks and recreational facilities such that substantial physical deterioration or degradation of the facilities would occur or be accelerated, or (2) result in adverse physical effects on the environment associated with the provision of new or expanded parks and recreational facilities.

b. Definitions

Bikeway, Class 1, often referred to as a **bike path**, is a hiking/biking trail with improved surface of concrete or asphalt for the bike and an unimproved surface for jogging; minimum width for two bikes is 8 feet, one bike is 5 feet, and hikers is 4 feet.

Bikeway, Class 2, often referred to as a **bike lane**, is for use along roadways in urban settings; it has a minimum lane width of 4 feet between the gutter or parking lane and the auto travel lane.

Bikeway, Class 3, often referred to as a **bike route**, designates a preferred route for cyclists on streets shared with motor vehicles.

Parks and Recreational Facilities, as used in this EIR, include (1) active recreational use areas such as a children's play apparatus area, paved game concrete area, turf playfield, picnic area, community garden, dog park, running or walking trail, swimming pool, or recreation center building; (2) passive recreational use areas such as a landscaped park, public open space, or open space available only to the residents of the development; (3) special facilities open to the public such as lakes or golf courses; and (4) special facilities only open to the residents of the development such as swimming pools and tennis courts.

3.16.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

The proposed TOD Plans are subject to a range of state and local plans, policies, and regulations, which are described below.

a. State Plans, Policies, and Regulations**Mitigation Fee Act**

The California Mitigation Fee Act, Government Code Sections 66000, et seq., allows cities to establish fees to be imposed upon development projects for the purpose of mitigating the impact that the development projects have upon the city's ability to provide specified public facilities. In order to comply with the Mitigation Fee Act, the city must follow four primary requirements:

- (1) Make certain determinations regarding the purpose and use of a fee and establish a nexus or connection between a development project or class of project and the public improvement being financed with the fee;
- (2) Segregate fee revenue from the General Fund in order to avoid commingling of capital facilities fees and general funds;
- (3) For fees that have been in the possession of the city for five years or more and for which the dollars have not been spent or committed to a project, make findings each fiscal year describing the continuing need for the money; and
- (4) Refund any fees with interest for developer deposits for which the findings noted above cannot be made.

As described below, the City of Inglewood has adopted a parkland dedication or in-lieu fee that is included in Municipal Code Chapter 12 Planning and Zoning, Article 30, Park Land Dedication, In-Lieu Fees and Park Development Fees.

Quimby Act

The Quimby Act was established by the California legislature in 1975 to provide parks for the growing communities in California. The Act authorizes cities to adopt ordinances to require dedication of parkland and/or in-lieu fees for residential subdivisions for the purpose of providing parklands and recreational facilities. The Quimby Act is part of the Subdivision Map Act and applies to residential subdivisions. It permits cities and counties to require new residential development to dedicate land or pay fees for park and recreational purposes. The Quimby Act establishes a standard of dedicating 3 acres of parkland per 1,000 residents for subdivisions for jurisdictions.

A 2013 amendment to the Quimby Act (Assembly Bill [AB] 1359) allowed cities and counties to use developer-paid Quimby Act fees to provide parks in neighborhoods other than the one in which the developer's subdivision is located. Previously, a city or county could only use these fees to provide parks that served the developer's proposed subdivision. Overall, AB 1359 provides cities and counties with opportunities to improve parks and create new parks in areas that would not have benefited before, if certain requirements are met, including the following:

- The neighborhood where the city or county is proposing to use the fees to provide parks must have fewer than 3 acres of park area per 1,000 population;
- The neighborhood where the proposed subdivision is located must have at least 3 acres of park area or more per 1,000 population;
- The city or county must hold a public hearing before using the fees in another neighborhood.
- The city or county must find it reasonably foreseeable that the new subdivision's residents will use the park facilities in the other neighborhood; and
- The city or county must use the fees in areas consistent with the city or county's local Quimby Act ordinance and General Plan.

AB 1359 also allows a city or county to enter into a joint or shared use agreement with one or more public districts in order to provide additional park and recreational access.

b. Local Plans, Policies, and Regulations

Inglewood Municipal Code

Municipal Code Chapter 12 Planning and Zoning, Article 30, Park Land Dedication, In-Lieu Fees and Park Development Fees requires the dedication of land at the rate of 3.0 acres per thousand persons (Municipal Code Section 12-105.5) or fees in lieu of such dedication be paid in the amount equal to each acre which otherwise would have been required to be dedicated at the median fair market value.

When adopting the ordinance for this Code Section, the City adopted findings that the public health, safety, and welfare of the City would benefit from a balanced system of parks and recreational areas in which sufficient flexibility is allowed for a developer to receive credit for private park and recreation space, and private open space that provides an acceptable mixture of different types of recreational uses of land, including (1) active recreational use areas such as a children's play apparatus area, paved game concrete area, turf playfield, picnic area, community garden, dog park, running or walking trails, swimming pool, or recreation center building; (2) passive recreational use areas such as a landscaped park, public open space, or open space available only to the residents of the development, (3) special facilities open to the public such as lakes or golf courses, (4) special facilities only open to the residents of the development such as swimming pools and tennis courts, and (5) plazas and fountains in commercial areas open to the public (City, 2009).

3.16.3 ENVIRONMENTAL SETTING

The City of Inglewood is a fully developed and urbanized community that lacks natural open space resources. Existing open space areas within Inglewood consist of developed City parks that provide passive and active recreation and open space areas, such as public plazas that provide visual relief from the urban environment and act as community gathering places.

Inglewood contains approximately 114.6 acres of existing or planned parks, recreation, and open space areas. This includes both indoor and outdoor recreation facilities. Of these facilities, six are located within the TOD Plan areas and total 70.2 acres as listed in **Table 3.16-1**. The California Department of Finance estimates the population of the City in 2015 to be 112,333. Based on the existing parkland acreage in the City, the City currently provides approximately 0.98 acre of parkland per 1,000 residents.

TABLE 3.16-1: PARKS AND RECREATION FACILITIES WITHIN THE CITY OF INGLEWOOD

Park	Location	Acreage	Equipment and Facilities
Parks Within or Adjacent to the TOD Planning Areas			
Ashwood Park	201 South Ash Avenue (Westchester/Veterans)	1.3	2 playgrounds, 2 tennis courts, 1 basketball court, 1 volleyball court, 2 picnic areas, 1 wading pool, 1 restroom/recreation office building
Centinela Adobe Park	7634 Midfield Avenue (Westchester/Veterans)	1.0	1 restored Historic 1830 Centinela Adobe house, 1 museum with restrooms, 1 restored Victorian Daniel Freeman office building
Park Acreage Within/Adjacent to the TOD Plan Areas		2.3 ac.	
Park Acreage Not Within/Adjacent to the TOD Plan Areas			
Center Park	3660 West 111th Street	1.2	1 playground, 1 multi-purpose playing field, 1 restroom
Circle Park	8300 Fifth Avenue	1.3	Trees and open space
Darby Park	3400 West Arbor Vitae Street	14.0	2 playgrounds, 2 tennis courts, 1 paddle tennis court, 4 half-basketball courts, 1 outdoor handball court, 2 lighted softball/football/ soccer fields, 1 wading pool, 2 picnic areas, 2 restrooms, 1 Skate park, multipurpose recreation building (20,900 s.f.) includes: gymnasium/full basketball court, weight room, sauna, meeting rooms, pool room, park office, snack bar/kitchen, restroom, parking lot.
Edward Vincent Jr. Park	700 Warren Lane	55.0	5 playgrounds, 8 tennis courts, 2 full basketball courts, 2 lighted and fenced softball fields, 2 lighted and fenced football/soccer fields, skate park, 3 picnic areas, pool complex consisting of 1 Olympic-size regulation swimming pool, 1 training pool, 1 wading pool, restroom, community playhouse, multipurpose/Girl Scout facility, and outdoor amphitheater.
Grevillea Park	231 South Grevillea	1.5	Trees and open space
Lockhaven Recreation Center	11125 Doty Avenue	n/a	13,000 s.f. community building and playground
North Park	625 East Hargrave Street	2.3	2 playgrounds, 3 tennis courts, and 1 picnic area

Park	Location	Acreage	Equipment and Facilities
Queen Park	652 East Queen Street	1.1	1 playground, 1 wading pool, 1 picnic area, 1 restroom, and a recreation office building
Rogers Park	400 West Beach Avenue	9.0	1 playground, 2 lighted tennis courts, 1 picnic area, 1 full basketball court, 1 lighted Little League baseball field, 1 lighted football/soccer field, 1 wading pool, 1 restroom, and a skate park is being planned. 33,500 square feet multi-purpose recreation building includes: gymnasium/basketball court with bleachers, auditorium, portable boxing ring, weight room, pool room, table tennis, meeting rooms, handball court, snack bar/kitchen, park office, restroom, and outdoor preschool area.
Siminski Park	9717 Inglewood Avenue	1.9	2 playgrounds, 1 basketball court, 2 picnic areas, 4,305 s.f. community center with offices, billiards, weight room, restrooms.
Hollywood Park Redevelopment Planned Facilities	Hollywood Park Redevelopment	25	25 acres of the planned development is designated for recreation/open space
City Park Acreage Outside the TOD Plan Areas		110.0 acres	
Total City Park Acreage		112.3 acres	

Source: City of Inglewood

3.16.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of recreation impacts. Appendix G of the CEQA Guidelines indicates that a project would have a significant effect if it were to:

Threshold REC-1 Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or

Threshold REC-2 Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

3.16.5 IMPACTS AND MITIGATION MEASURES

Threshold REC-1: Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Impact REC-1: New residential development permitted by the proposed TOD Plans would increase demand for parks and recreational facilities within the City. Based on the City's 3.0 acres per 1,000 population standard for provision of park and recreational facilities, 33.87 acres would be needed for the residential development proposed in the TOD Plans. The TOD Plans includes provision of 30.7 acres of park and recreational facilities, resulting in a deficit of 3.17 acres of dedicated park land. Because site-specific residential development projects permitted by the TOD Plans would include private onsite open space and/or recreation facilities, and would be required pay the City's Park Land Dedication In-Lieu Fees and Park Development Fees pursuant to Municipal Code Section 12-105.5 to make up for the deficit in dedicated park land, the proposed TOD Plans would provide sufficient park and recreational facilities such that substantial physical deterioration would not occur or be accelerated. Impacts would therefore be *less than significant*.

Methodology

The analysis below considers the increase in use of parks and recreation facilities that would result from the increased development intensity proposed by the TOD Plans, along with the ability of existing park and recreation facilities to accommodate increased use. The analysis considers whether an increase in use generated by increased population within the TOD areas would result in the substantial physical deterioration of existing recreational facilities, such as accelerated wear on sports facilities and fields, or result in the need for new or expanded facilities.

The City standard for the provision of parkland is 3.0 acres of parkland per 1,000 residents (Municipal Code Section 12-105.5) and allows for a mixture of different types of recreational uses including plazas and fountains in commercial areas open to the public. A shortfall in the provision of such parkland from the proposed TOD Plans would be presumed to increase use of existing parks and recreational facilities and potentially cause deterioration of these existing facilities.

Impact Assessment

Build out of the proposed TOD Plans would result in a net increase of 4,090 residential units (1,106 in Westchester/Veterans and 2,984 in Crenshaw/Imperial). With the addition of this housing, residential population is expected to grow by 11,289 persons (3,053 in Westchester/Veterans and 8,236 in Crenshaw/Imperial). As described above, the City's standard for the provision of parkland is 3.0 acres of parkland per 1,000 residents; therefore, build out of the TODs Plan would require dedication of 33.87 acres of park and recreational facilities or payment of in-lieu fees (9.16 acres in Westchester/Veterans and 24.71 acres in Crenshaw/Imperial).

The City's Municipal Code recognizes that certain types of plazas, fountains, and other commercial public spaces serve residents in a mixed-use community. The Westchester-Veterans TOD Plan proposes several new public open spaces to address the existing lack of parks in the City and provide identity and amenities for the TOD Plan area. These include:

- A new park within the existing Isis Avenue right-of-way between Florence Avenue and Manchester Boulevard, with a plaza area located within what is currently the Airport Plaza shopping center.
- Conversion of the existing 1019WEST artist studios parking lot on Manchester Boulevard and Hindry Avenue into a publicly or privately maintained arts park¹.
- The Triangle Block bounded by Manchester Boulevard, Olive Street and Glasgow Avenue provides an opportunity to create an approximately one-acre open space area.
- If land becomes available for development, a public garden is proposed on the west side of Aviation Boulevard at Hillcrest Boulevard.
- Florence Ash Park will be located on the southwest corner of Florence and Ash Avenues, replacing a vacant auto repair shop, substandard residential uses and an older brick industrial building with a neighborhood-oriented park buffered from the I-405 freeway.
- Extension of the Downtown Green Boulevards network to include Manchester Boulevard through the Westchester/Veterans TOD Plan area.
- Pedestrian and bicycle connection on the old rail bridge across the 405 freeway at Florence Avenue.

¹ The existing 1019WEST artist studios building is designed to accommodate parking on the roof such that conversion of the existing parking lot would not result in the loss of automobile parking.

New open spaces will also be provided within the Crenshaw/Imperial TOD Plan area, including:

- A City Gateway/District Center Focal Plaza providing entry plazas to each development at the corner of the Crenshaw Boulevard/Imperial Highway intersection.
- Public/Private Open Spaces providing amenities for the mixed-use residential and retail uses within each quadrant of the Crenshaw Boulevard/Imperial Highway intersection, the publicly accessible portion of which that will also become a source of recreation space for the surrounding residential.
- The Ring Open Space around the Crenshaw Boulevard/Imperial Highway intersection will provide over a mile of walking and bicycling paths for both the residents of the new, mixed-use developments and the residents of the adjacent single-family neighborhoods.
- Open Space Connectors will provide pathways between the Gateway Focal Plazas, the Public-Private Open Spaces, the Ring Open Spaces and to the sidewalks fronting Crenshaw Boulevard and Imperial Highway. The TOD Plan states that these Open Space Connectors “may take the form of pedestrian walkways, additional open space or connectors.”
- A Gateway Park is proposed to be created by correcting the unsafe, existing northbound freeway entrance to eliminate uncontrolled conflicts between pedestrians and autos accessing the freeway.

TABLE 3.16-2: PARKS, PLAZAS, AND RECREATION FACILITIES PROVIDED BY THE TOD PLANS

Recreational Facility	Acreage
Parks and Open Space	
Westchester/Veterans TOD Plan Area	
Isis Avenue right-of-way	0.7
1019WEST parking lot	0.3
Triangle Block	1.2
Public Garden on Aviation Boulevard	5.9
Florence Ash Park	1.3
Florence Avenue Bridge	0.5
Crenshaw/Imperial TOD Plan Area	
Publicly Accessible Open Spaces at Corner of Crenshaw/Imperial	16.5
Gateway Park	1.4
Bike Paths	
Westchester/Veterans TOD Plan Area	2.6
Crenshaw/Imperial TOD Plan Area	0.3
TOTAL	30.7

Source: The Arroyo Group, 2017

In addition, future site-specific residential development projects that would be permitted by the TOD Plans would include onsite open space for the residents. Those projects that do not meet

the 3 acres per 1,000 residents standard would be required to dedicate land to be used for public parkland or pay the City's Park Land Dedication In-Lieu Fees and Park Development Fees, pursuant to Municipal Code Section 12-105.5. The fees collected would be used for development and improvement of public parks and recreation facilities throughout the City.

Compliance with Municipal Code requirements applicable to the provision of parks and recreational facilities or payment of fees in lieu will be incorporated into all conditions of approval for development plans approved within the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas. As part of the planning review of future site-specific development, the City Planning Division will review all proposed site-specific development projects for the provision of public and private park and recreational facilities prior to approval of development, and confirm that the site-specific development project has provided a combination of park/recreational facilities and/or fee payments to the City at the rate in effect at the time of permit issuance to offset the increased demand for park and recreation services generated by the proposed site-specific development project.

Significance Conclusion for Impact REC-1

New residential development permitted by the proposed TOD Plans would increase demand for parks and recreational facilities within the City. Based on the City's 3.0 acres per 1,000 population standard for provision of park and recreational facilities, 33.87 acres would be needed for the residential development proposed in the TOD Plans. As noted above, the TOD Plan includes provision of 30.7 acres of park and recreational facilities, resulting in a deficit of 3.17 acres of dedicated park land. Because site-specific residential development projects permitted by the TOD Plans would include onsite open space and/or recreation facilities for residents, and would be required pay the City's Park Land Dedication In-Lieu Fees and Park Development Fees pursuant to Municipal Code Section 12-105.5 to make up for the deficit in dedicated park land, the proposed TOD Plans would provide sufficient park and recreational facilities such that substantial physical deterioration would not occur or be accelerated. Impacts would therefore be less than significant.

Threshold REC-2: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impact REC-2: Construction and operation of proposed parks and recreation facilities would contribute to impacts addressed throughout this EIR, except for those impacts specifically related to population growth, except for those impacts specifically related to

population growth or to the operations of proposed uses. The significance of these impacts would be as identified in other EIR sections.

Methodology

The analysis of construction impacts associated with the development of parks and recreational facilities starts with the identification of whether the proposed TOD Plans would involve or result in new park or recreation facilities. Should the TOD Plans include or require the construction or expansion of park and recreational facilities, the analysis would identify if the construction of these facilities could result in adverse physical effects on the environment. The analysis of the potential adverse physical effects is considered as part of the overall project and draws on conclusions in other sections of this EIR, such as air quality, greenhouse gas emissions, noise, cultural resources, geology and soils, hydrology and water quality, and traffic and transportation. If construction of parks and recreation facilities would cause or contribute to significant unavoidable impacts related to air quality, greenhouse gas emissions, noise, cultural resources, geology and soils, hydrology and water quality, or traffic and transportation, a significant impact in relation to Impact REC-2 would occur.

Impact Assessment

The proposed TOD Plans would involve construction of new parks and recreational facilities as described above in **Impact REC-1**. Physical environmental effects from activities such as excavation, grading, landscaping, and construction of recreational facilities, as well as operations of proposed park and recreational areas, have been analyzed as part of the impact analyses throughout this EIR.

Significance Conclusion for Impact REC-2

Construction and operation of proposed parks and recreation facilities would contribute to impacts addressed throughout this EIR, except for those impacts specifically related to population growth or to the operation of proposed uses permitted by the TOD Plans. The significance of these impacts would be as identified in other EIR sections.

Mitigation Measures

All mitigation measures set forth in this EIR not specifically directed to residential and commercial areas of the site and their operations would apply to the physical effects of proposed parks and recreational uses.

Significance Conclusion for Impact REC-2 with Implementation of Mitigation Measures

With implementation of mitigation measures, impacts from construction and operation of proposed parks and recreation facilities would have the same level of significance as identified for impacts throughout this EIR, except for those impacts specifically related to population growth or the proposed residential and commercial areas and their operations.

3.16.6 REFERENCES

City of Inglewood General Plan Open Space Element, December 1995.

Hollywood Park Redevelopment Final Environmental Impact Report, May 2009 (City 2009).

Accessed December 21, 2018: <http://file.lacounty.gov/bos/supdocs/81451.pdf>

The Arroyo Group, *Westchester/Veterans Station Area Transit-Oriented Development Plan and Design Guidelines, Public Review Draft*, November 2017.

The Arroyo Group, *Crenshaw/Imperial Station Area Transit-Oriented Development Plan and Design Guidelines, Public Review Draft*, November 2017.

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CHAPTER 4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

Pursuant to Section 15126.2(c) of the California Environmental Quality Act (CEQA) Guidelines, this chapter evaluates the potential for significant irreversible environmental changes to result from site-specific development and infrastructure projects that would be permitted by the proposed TOD Plans. Section 15126.2(c) reads as follows:

(c) Significant Irreversible Environmental Changes Which Would be Caused by the Proposed Project Should it 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 unlikely. 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.

4.1 IRREVERSIBLE COMMITMENT OF RESOURCES

Nonrenewable resources, such as natural gas, petroleum products and fossil fuels, asphalt, petrochemical-based construction materials, steel, copper, other metals, and sand and gravel, are commodities with a finite supply. To varying degrees, these materials are readily available and some, such as asphalt and sand and gravel, are abundant. Future development that would be permitted by the TOD Plans would entail the commitment of such nonrenewable resources along with water and other, slowly renewable resources such as lumber and other forest products during project construction. New land uses permitted by the TOD Plans would also consume natural gas and electricity, as well as consumer products manufactured from nonrenewable sources, during ongoing operations.

The proposed TOD Plans would directly result in irreversible environmental changes in that lands on which new transit-oriented development occurs would be committed to higher intensity and in some cases different uses once site-specific development projects are approved and are constructed. The proposed TOD Plans would also indirectly result in irreversible environmental changes including:

- Construction of new development as described in Chapter 2, *Project Description*, would require consumption of non-renewable energy resources and construction materials.
- Increased vehicle miles traveled on area roadways and freeways (see Section 3.7, *Transportation*).

- Emissions of air pollutants and greenhouse gasses associated with construction and operation of site-specific development projects permitted by the TOD Plans (see Section 3.8, *Air Quality* and Section 3.9, *Greenhouse Gas Emissions*).
- Consumption of non-renewable energy resources associated with construction and operation of future site-specific development projects due to the vehicular travel and onsite consumption of electricity and natural gas (see Section 3.10, *Energy*).
- Increased ambient noise resulting from increased and traffic associated with future site-specific development projects permitted by the TOD plans (see Section 3.11, *Noise and Vibration*).
- Increase consumption of water resources as the result of construction and operation of site-specific development projects permitted by the TOD Plans (see Section 3.16, *Utilities, Service Systems, and Water Supply*).

4.2 IS PROPOSED CONSUMPTION OF RESOURCES JUSTIFIED?

As demonstrated in the analyses contained in Chapter 3, the proposed TOD Plan for the Westchester/Veterans and Crenshaw/Imperial areas would not involve wasteful or unjustifiable use of non-renewable resources, and conservation efforts would be enforced during construction and operation of site-specific development projects permitted by the TOD Plans per the requirements of the TOD Plans and the mitigation measures contained in this EIR. As noted in Chapter 2, Project Description, among the overarching objectives of the TOD Plans is to “maximize utilization of the Metro Crenshaw/LAX Line Westchester/Veterans Station and the Metro Green Line Crenshaw Station through the creation of pedestrian-friendly and economically vibrant mixed-use settings and improved non-vehicular access to the stations,” which would minimize use of non-renewable energy for vehicular transportation.

Proposed development within the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas would incorporate energy-generating and conserving features, including by Title 24 and CALGreen standards, which specify green building standards for new developments. Facilities development also would incorporate sustainable construction policies and features, resulting in a more energy-efficient development and reduced consumption using local materials and labor. Characteristics of site-specific development and infrastructure projects that would be permitted by the proposed TOD Plans and mitigation measures related to energy consumption are addressed in Section 3.10, *Energy Resources*, of this EIR.

5.1 INTRODUCTION

This section analyzes the growth inducement potential of the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans and the associated secondary effects of growth the TOD Plans would permit. As required by CEQA Guidelines Section 15126.2(d), an EIR must:

“Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a recycled water plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

A project can have a direct effect on population growth, for example, if it would involve construction of substantial new housing. A project could also have indirect growth-inducement potential if it would:

- Establish substantial new permanent employment opportunities (e.g., commercial, industrial, governmental, or other employment-generating enterprises) or otherwise stimulate economic activity;
- Remove a physical or regulatory obstacle to additional growth and development, such as removing a constraint to or increasing the capacity of a required public service (physical obstacle). For example, an increase in the capacity of utility or road infrastructure could allow either new or additional development in the surrounding area. A project could also include growth by removing a regulatory obstacle, such as by increasing allowable development intensity; or
- Stimulate economic activity within an area such that it would result in the need for additional housing, businesses, and services to support increased economic activities.

Thus, the discussion of growth inducement draws largely on the evaluations set forth in Section 3.4, *Population and Housing*, of this EIR.

Although CEQA Guidelines focus discussion of housing and population impacts on unplanned growth, the Guidelines do not distinguish between planned and unplanned growth for purposes of considering whether a project would foster additional growth and therefore be “growth inducing.” Therefore, for purposes of this Chapter, to reach the conclusion that the TOD Plans would be growth inducing as defined by CEQA, the EIR need only determine that the TOD Plans would foster (i.e., promote or encourage) additional growth in economic activity, population, or housing, regardless of whether the growth is consistent with or is beyond the level of growth that is anticipated by local plans and regional growth projections (i.e., planned or unplanned). Consistent with CEQA Guidelines Section 15126.2(d), the conclusions set forth in this Chapter regarding growth inducement do not, however, address or imply whether such induced growth is beneficial or detrimental.

If the analysis contained in this Chapter determines that the TOD Plans have growth inducing effects, the next question to be addressed is whether that growth may cause adverse effects on the environment. Environmental effects resulting from induced growth (i.e., growth-induced effects) fit the CEQA definition of “indirect” effects in Section 15358(a)(2) of the State CEQA Guidelines. These indirect or secondary effects of growth may result in significant environmental impacts.

While CEQA Guidelines require an EIR to “discuss the ways” a project could induce growth, and to discuss project characteristics that may “encourage... activities that could significantly affect the environment,” CEQA Guidelines do not require an EIR to attempt to predict where, when, or in what form induced growth might occur. The answers to such questions require substantial speculation, which CEQA discourages (CEQA Guidelines Section 15145).

Any decision whether to allow the projects that that would directly cause induced growth is the subject of separate decision making by the lead agencies responsible for considering such projects. Because the decision to allow growth is subject to separate discretionary decision making, and such decision making would be subject to CEQA, the analysis of growth-inducing effects is not intended to determine site-specific environmental impacts or mitigation for the potentially induced growth. Rather, the discussion provided in this EIR is intended to disclose the potential for environmental effects to occur more generally, such that decision makers are aware that additional environmental effects are a possibility if growth-inducing projects are approved. The determination as to whether impacts do occur, their extent, and the ability to mitigate them is appropriately left to consideration by the agency responsible for approving such projects at such times as complete applications for development are submitted.

5.2 POTENTIAL FOR GROWTH INDUCEMENT

5.2.1 DIRECT POPULATION AND EMPLOYMENT GROWTH

“Direct” growth results when a project proposes new housing, retail, or employment-generating development that would result in additional residents and jobs. Additionally, a project would directly induce growth if it would remove barriers to population growth such as a change to a jurisdiction’s general plan or zoning ordinance to increase the amount of allowable housing, retail, or employment-generating development.

The proposed TOD Plans would result in changes in zoning to allow for higher density development than currently exists, including residential, non-residential, and mixed-use transit-orientated development near the existing Crenshaw Green Line Metro station and the under-construction Westchester/Veterans station on the Metro Crenshaw-LAX line. At build out, the proposed TOD Plans would provide for a net increase of 4,090 residential units, which is anticipated to increase the City’s population by approximately 11,289 people; and a net increase of approximately 705,968 square feet of non-residential commercial and employment-generating uses that would create 5,684 new jobs over the next 20 years. Thus, the TOD Plans would induce population growth within the City of Inglewood.

SCAG estimates that by 2040, the City of Inglewood would have a total population of 129,000, representing an increase of 8,800 residents over the City’s estimated 2020 population of 120,800. Buildout of the proposed TOD Plans would exceed the City’s projected population increase by generating a net population increase of 11,289 persons (3,053 in Westchester/Veterans and 8,236 in Crenshaw/Imperial). In addition, the proposed TOD Plans are projected to generate a net increase of approximately 5,684 jobs within the Westchester/Veterans and Crenshaw/Imperial areas, which would occur incrementally over the anticipated 20-year build out of the TOD Plans. Connect SoCal, however, projects a net increase of only 1,000 jobs citywide.

As noted in Section 3.3, *Land Use and Planning Policy*, land use and patterns and growth that facilitates transit and active transportation (pedestrian and bicycle use) is a goal of the Connect SoCal regional sustainable communities strategy. Inglewood’s proposed and approved TOD Plans are a direct response to this goal. Because Inglewood and surrounding communities are highly urbanized and largely built out with little vacant land, the likely result of the Westchester/Veterans and Crenshaw/Imperial TOD Plans in relation to regional growth would be to increase the concentration of already forecasted regional growth in transit-oriented locations, rather than add population growth beyond current regional projections.

Additionally, the 4, Westchester/Veterans and Crenshaw/Imperial TOD Plans would accommodate population and employment growth in an environmentally sustainable manner by providing mixed-use developments near transit with pedestrian and bicycle facilities to promote non-vehicular transportation. As such, the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would result in direct population and employment growth toward major transit stops in a manner consistent with regional planning programs.

In addition, the population and employment growth at maximum buildout within the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans, as well as the approved Downtown Inglewood and Fairview Heights TOD Plans is a conservative estimate because it assumes that full occupancy (no vacancy) would occur. In actuality, it is anticipated that all new development would experience a normal (4-6 percent) vacancy rate, and that the projected maximum development may not occur in full depending on market conditions.

5.2.2 REMOVE OBSTABLES TO GROWTH

Elimination of a physical obstacle to growth¹ is considered to be a growth inducing impact. The proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans would induce growth if public services or infrastructure would be provided with excess capacity to serve lands that would otherwise not be suitable for future development but for the capacity provided by the TOD Plans.

The TOD Plan areas are developed urban areas and the site-specific development projects that would result consist of infill redevelopment of previously developed sites rather than undeveloped land. Site-specific development within the TOD Plan areas would be connected to the City's existing water, sewer, drainage, and roadway infrastructure. As described in Section 3.16, *Utilities, Service Systems, and Water Supply*, site-specific development projects permitted by the TOD Plans would include installation of onsite infrastructure and new connections to the existing infrastructure systems, which could include improvements to existing aged infrastructure designed to serve site-specific developments permitted by the TOD Plans and would not extend or expand infrastructure for unserved or underserved areas. The TOD Plans also propose circulation improvements, such as pedestrian and bicycle facilities, which would enhance local circulation and use of the existing and future Metro stations. Thus, infrastructure improvements would not result in growth inducing impacts other than the growth proposed by the TOD Plans themselves.

¹ A physical obstacle to growth typically involves the lack of infrastructure or public services that have constrained an area's suitability for residential, retail, or employment-generating development.

5.2.3 SUPPORT ECONOMIC GROWTH

Induced growth can occur outside of a site-specific development project site as the result of direct and indirect investment and spending by residents, employees, and businesses. Such growth stems from the “induced” employment generated by a project’s economic activity. Indirect employment growth generated by a direct increase in economic activity can be due to the increases in spending that would occur on the part of the businesses, employees, and employee households. It could also be due to the additional spending that would occur on the part of suppliers of goods and services demanded by a project’s direct economic activity (households, businesses, and employees).

Build out of the TOD Plans would generate a ratio of 1.46 jobs per household. Because the City currently has a jobs-to-housing ratio of 0.8, build out of the TOD Plans would result in an improvement in the jobs-household ratio, which is a benefit and an objective of the proposed TOD Plans.

In addition, the City of Inglewood has had unemployment rates exceeding those of Los Angeles County and the State of California. As described in Section 3.4, *Population, Housing, and Employment*, most of the new jobs that would be created by the TOD Plans would be retail, commercial, or industrial related positions that do not require a specialized workforce, and this type of workforce exists in the City. Thus, due the availability of a workforce, it is anticipated that new jobs that would be generated by the TOD Plans would be filled by people within Inglewood and surrounding communities and would not induce an unanticipated influx of new labor into the region.

5.3 ENVIRONMENTAL IMPACTS OF INDUCED GROWTH

As described above, the TOD Plans propose increased meeting housing and employment-generating uses in an environmentally sustainable manner adjacent to major transit stops along Southern California’s Metro rail system in a manner consistent with SCAG’s regional land use policies. All physical environmental effects from construction of future site-specific development that would be permitted by the TOD Plans has been analyzed in the technical sections of this EIR. For example, activities such as excavation, grading, and construction as required for new residential and employment uses would result in impacts that are analyzed in the Air Quality, Greenhouse Gas Emissions, Noise, and Transportation and Traffic sections. Therefore, construction of land uses induced by the proposed TOD Plans has been analyzed in this EIR and would be adequately mitigated either through implementation of code requirements and/or mitigation measures contained within Chapter 3 of this EIR.

5.4 REFERENCES - GROWTH INDUCEMENT

State of California Employment Development Department (EDD 2018). *Historical Data for Unemployment Rate and Labor Force (Not Seasonally Adjusted) in Los Angeles County*. Accessed March 30, 2016: www.labormarketinfo.edd.ca.gov

6.1.1 INTRODUCTION

a. Overview

This chapter analyzes ways in which the impacts of the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans might combine with the impacts of other past, present, and reasonably foreseeable probable future projects causing related impacts to create significant “cumulative impacts.” If the effects of the proposed TOD Plans, in combination with the effects of other past, present, and reasonably foreseeable probable future projects, would be significant, the TOD Plan’s contribution to the combined cumulative significant impact is analyzed as required by the California Environmental Quality Act (CEQA) to determine if it is “cumulatively considerable.” Cumulative impacts are organized by resource topic and analyzed below.

b. Definitions

Cumulative impacts are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts... The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time” (CEQA Guidelines Section 15355).

Cumulatively considerable means that the incremental effects of an individual project would be significant when viewed in connection with the effects of past, current, and reasonably foreseeable probable future projects (CEQA Guidelines Section 15065(a)(3)).

6.2 CEQA REQUIREMENTS AND APPROACH TO CUMULATIVE IMPACT ANALYSIS

In accordance with CEQA Guidelines Section 15130(b), the discussion of cumulative impacts provided in this chapter is intended to “reflect the severity of the impacts and their likelihood of occurrence.” CEQA Guidelines Section 15130(b) states that the discussion of cumulative impacts “need not provide as great [a level of] detail as is provided for the effects attributable to the project alone.” The CEQA Guidelines direct that the discussion should be guided by practicality and reasonableness and focus on the cumulative impacts that would result from the

combination of the proposed project and other projects, rather than the attributes of other projects that do not contribute to cumulative impacts.

Pursuant to CEQA Guidelines Section 15130(a)(1), this environmental impact report (EIR) discusses only those cumulative impacts that would result at least in part from the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans and are being evaluated in this EIR. Thus, cumulative impact analysis is not provided for any environmental issue where the proposed TOD Plans would have no environmental impact. Analysis of cumulative impacts is, however, provided for all impacts of the TOD Plans, whether they were determined to be significant and unavoidable, significant but mitigable, or less than significant.

When incorporating the impacts of past and present projects into the cumulative analysis set forth below, the currently developed portions of ongoing phased projects as they existed in the 2017 baseline year are incorporated in the environmental setting/baseline described in the individual resource sections. The portions of ongoing phased development projects that were yet to be built as of the 2017 baseline year are included as part of the analysis of cumulative impacts.

The CEQA Guidelines provide two approaches to analyzing cumulative impacts (CEQA Guidelines Section 15130(b)(1)). The first is the “list approach,” which requires a listing of past, present, and reasonably foreseeable probable future projects producing related or cumulative impacts, including, if necessary, projects outside the control of the lead agency. The second approach relies upon projections contained in an adopted local, regional, or statewide plan or related planning document as the basis of the cumulative analysis. A reasonable combination of the two approaches may also be used.

The cumulative analysis for air quality, greenhouse gas emissions, and traffic relies on projections contained in adopted local, regional, or statewide plans or related planning documents, such as the Southern California Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) “Connect SoCal.” The land use and socioeconomic database, as well as growth forecasts for Southern California that were described in Connect SoCal. The cumulative analyses for other environmental issues use the list of projects approach. The list of probable future projects within the geographic scope of the impact analyses is based upon information provided by the City of Inglewood.

Different types of cumulative impacts occur over different geographic areas. For example, the geographic scope of the cumulative air quality analysis, where cumulative impacts occur over a large area, is different from the geographic scope considered for cumulative analysis of cultural resources, for which cumulative impacts are limited to specific resource types. Thus, in assessing cultural resources impacts, only development within and immediately adjacent to the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas that would contribute to a

cumulative effect on a cultural resource is analyzed, whereas cumulative air quality impacts are based upon development throughout the South Coast Air Basin. Because the geographic scope and other parameters of each cumulative analysis discussion can vary, the cumulative geographic scope, and the cumulative projects included in the geographic scope (when the list of projects approach is used), are described for each environmental topic.

A total of 158 projects were identified within the vicinity of the project site as of May 2021 whose physical environmental effects might combine with those of the proposed TOD Plans to create one or more cumulative impacts. Of the 158 projects, 68 are within the City of Inglewood (City), 12 are Los Angeles International Airport projects, 12 are in the City of Hawthorne, 20 are in the City of Los Angeles, 14 are in unincorporated Los Angeles County, and 31 are in other Los Angeles County cities. There is also one Los Angeles County Metro project. These cumulative projects for the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plan are identified in **Table 6-1**.

TABLE 6-1: CUMULATIVE PROJECTS LIST

	PROJECT	ADDRESS	DESCRIPTION
City of Inglewood			
1	Downtown Inglewood TOD Plan	½ mile radius around Downtown Inglewood Metro Station	Net increase of 2,479 multi-family dwelling units, 142,053 s.f. retail, 351,328 s.f. office, and 235 hotel rooms, along with net demolition of 41,073 s.f. institutional building area
2	Fairview Heights TOD Plan	½ mile radius around Fairview Heights Metro Station	Net increase of 214 multi-family dwelling units, 6,882 s.f. retail, 351,328 s.f. office, and 382,267 s.f. institutional building area
3	Inglewood Basketball and Entertainment Center (Murphy Bowl [Los Angeles Clippers] Project)	Yukon Avenue/Century Boulevard Prairie Avenue/Century Boulevard	18,000 fixed seat basketball arena with additional temporary seating for other events; 85,000 s.f. practice and athletic training facility; 55,000 s.f. Clippers team office space; 25,000 s.f. sports medicine clinic; 40,000 s.f. retail and ancillary uses; outdoor plaza; parking facilities
4	General Plan Environmental Justice Element	Citywide	General Plan Amendment for Environmental Justice Element
5	General Plan Housing Element	Citywide	General Plan Amendment for 6 th Cycle Housing Element
6	Inglewood Transit Connector	Citywide	Transit connection between the Crenshaw/LAX Metro line and the Forum, Los Angeles Stadium and Entertainment District, and the Inglewood Basketball and entertainment Center
7	Shopping Center Addition	2616-2878 W. Imperial Highway	Renovation and adding 13,000 s.f., façade and parking lot Improvement of an existing shopping center
8	Condominiums	501 E. 99th Street	12 new condominium units
9	Apartments	704 N. Market Street	12 new residential apartment units

	PROJECT	ADDRESS	DESCRIPTION
10	Condominiums	664 E. Manchester Terrace	4 new condominium units
11	Apartments	844 N. Centinela Avenue	4 new residential apartment units
12	Apartments	125 E. Spruce Avenue	7 new apartment units with semi-subterranean parking.
13	Parking Lot	279 W. Beach Avenue	Development of 190 parking spaces
14	Townhomes	573 1/2 E. Hyde Park Place	3 townhomes with 6 enclosed parking spaces.
15	Townhomes	333 N. Prairie Avenue	226 townhome units at the former Daniel Freeman Hospital site
16	Commercial Building	408 E. Warren Lane	2 story 2,542 s.f. commercial building
17	Mixed-Use	205 N Market Street	243 multi-family units; 55,000 s.f. retail
18	Centinela Hospital	555 W. Hardy Street	<p>West Tower: Upgrades including the remodel of the main building entrance and the south elevation and seismic upgrades in compliance with SB 1953.</p> <p>Electrical Upgrade: A campus-wide electrical upgrade that includes construction of a new 5,900 s.f. repair shop building and 4,200 s.f. electrical yard with three emergency generators and a 16,000-gallon underground fuel tank for 72-hour emergency power at the northeast corner of the campus on Flower Street.</p> <p>Emergency Department: A new 2,400 s.f. addition and redesigned front entrance to the Emergency Department including new admitting, triage, and waiting areas, and expanding the capacity of the Emergency Department by eight beds (total of 52 beds).</p> <p>Loading and Delivery Areas: Other upgrades that includes the demolition of two building (totaling 6,200 s.f.), the partial demolition of a 4,670 s.f. building, addition, or rehabilitation of various buildings and relocation of the delivery and loading areas from the emergency room area to the rear of the campus.</p>
19	Hollywood Park Project	1050 S. Prairie Avenue	<p>80,000-seat sport stadium;</p> <p>6,000-seat performance venue;</p> <p>2,500 dwelling units;</p> <p>890,000 s.f. retail;</p> <p>780,000 s.f. office;</p> <p>120,000 s.f. casino,</p> <p>300-room hotel;</p> <p>25 acres open space;</p> <p>4-acre civic site.</p>
20	Apartments	417-433 Centinela Avenue	116 apartment units
21	Residential	3660 W. 107th Street	3 dwelling units with 6 car garage
22	Congregate Living Facility	614 E. Hyde Park Boulevard	8-bed congregate living facility
23	Apartments	921 N. Edgewood Street	38 apartment units

	PROJECT	ADDRESS	DESCRIPTION
24	Townhomes	113-133 Plymouth Street	20 townhome units
25	Mixed Use	101,125,139,140,150 Market Street	50 dwelling units 40,000 s.f. retail 150 parking spaces
26	Hotel	11111 S. Prairie Avenue	120-Room Hotel
27	Condominiums	961 E 68th Street	3 condominium units
28	Multi-Family Residential	411 E Hazel Street	18-unit multi-family building
29	Multi-Family Residential	222 W Spruce Avenue	10-unit multi-family building (1 affordable dwelling unit)
30	Multi-Family Residential	819 E La Palma Drive	5-unit multi-family building with affordable dwelling units
31	Condominiums	417 N Market Street	12 condominium units
32	Congregate Living Facility	814 N Market Street	8-bed congregate living facility
33	Los Angeles Philharmonic Association - Youth Orchestra Program	101 S La Brea	Los Angeles Philharmonic Association - Youth Orchestra Program that will serve students 6 - 18 yrs. The development includes Exterior and Interior improvements of an existing 25,000 sq. ft. building.
34	Apartments	3920 W 108th Street	3-unit apartment building
35	Self-Storage Facility	943-959 W Hyde Park Boulevard	5- story 79,415 sq-ft self-storage facility
36	Mixed-Use	3320 W 85th Street	65-unit senior mixed-use development
37	Intermodal Transportation Facility	1050 S Prairie	Intermodal transportation facility
38	Multi-Family Residential	332 Stepney	8-unit multi-family building with 3 affordable units
39	Mixed-Use	336 W Hillcrest Boulevard	65-unit mixed-use adaptive reuse of existing office building
40	Self-Storage Facility	3700 102nd Street	5- story 79,415 sq-ft self-storage facility
41	Multi-Family Residential	423 E Warren Lane	44 multi-family units with 5 very low-income units
42	Hotel	3820 W 102nd Street	14-story, 300 room hotel with 349 parking spaces
43	Multi-Family Residential	715 N Marlborough Avenue	Conversion of 3 offices into residential units with 1 affordable unit
44	Multi-Family Residential	220 E Hazel Street	4-unit apartment building with subterranean parking for 7 vehicles
45	Commercial Building	970 W Manchester Boulevard	1,800 sq-ft car/bus wash and above ground fueling station within a car rental site
46	Multi-Family Residential	1013 E La Palma Drive	3-story apartment units with at-grade parking
47	Apartments	608 E Queen Street	4-unit apartment building and parking
48	Office Building	455 N Prairie Avenue	6,530 square foot, two story medical office building
49	Commercial Building	335 Glasgow Avenue	Auto rental facility
50	Apartments	1001 N Welton Way	11-unit apartment building
51	Commercial Building	1031 Manchester Boulevard	Restaurant with outdoor dining for existing brewery

6.0 Cumulative Environmental Effects

	PROJECT	ADDRESS	DESCRIPTION
52	Commercial Building	408 E Warren Lane	2-story commercial office/warehouse
53	Multi-Family Residential	527 E Hyde Park Boulevard	21-unit, 4-story building with two affordable units
54	Commercial Building	230 W Arbor Vitae	899 square-foot fast food restaurant
55	Congregate Living Facility	814 N Market Street	12-unit, 5,163 sq-ft congregate health, residential care facility
56	Apartments	716 W Beach Ave	42,745 sq-ft, 42-unit multi-family apartment (41 affordable units) 716-730 W Beach Ave.
57	Mixed-Use	317 S La Brea	311 Units (32 affordable and 5 live-work units) 22,000 sf commercial/retail 361 parking spaces
58	Multi-Family Residential	11227 S Prairie Avenue	400 dwelling units
59	Multi-Family Residential	201 N La Brea Avenue	144 units (14 affordable); 72 parking spaces
60	Billboard	Florence Avenue/La Brea Avenue	New full motion, electronic billboard in roadway right-of-way
61	Billboard	Manchester Boulevard/Crenshaw Boulevard	New full motion, electronic billboard in roadway right-of-way
62	Billboard	Century Boulevard/Club Drive	New full motion, electronic billboard in roadway right-of-way
63	Hotel	4041 W Century Boulevard	145-room, 6-story hotel with 125 parking spaces
64	Condominiums	334 Stepney	4 condominium units
65	Multi-Family Residential	616-620 99th Street	20 dwelling units with affordable housing
66	Multi-Family Residential	738 Venice Way	9 dwelling units with affordable housing
67	Zoning Code Amendment	Citywide	Short-term rentals regulations
68	Apartments	923 Redondo Blvd	4-story mixed-use building with 101 apartment units.
Los Angeles County Metro			
69	Crenshaw/LAX Metro Rail Line	Cities of Los Angeles and Inglewood	8.5-mile light rail transit line connecting existing Metro Green and Expo lines to LAX and stations
Los Angeles International Airport			
70	LAX Landside Access Modernization Program (LAMP)	Los Angeles International Airport	Redevelop ground access system to LAX, including intermodal transportation facility providing transit connections, consolidated offsite rental car facility, people mover system, and pedestrian walkway connections
71	Terminal 1, Terminal 2, and South Terminal	Los Angeles International Airport	Interior improvements and building system upgrades
72	Terminal 1.5; Between Terminals 1 and 2	Los Angeles International Airport	Construction of new passenger terminal
73	Terminals 2 and 3 Modernization	Los Angeles International Airport	Major improvements to Terminals 2 and 3
74	Terminal 3 Connector	Los Angeles International Airport	Passenger connection between Bradley International Terminal and Terminal 3

	PROJECT	ADDRESS	DESCRIPTION
75	Miscellaneous Projects and Improvements	Los Angeles International Airport	LAWA is undertaking a series of minor projects and improvements to airport facilities.
76	Argo Drain Sub-Basin Stormwater Infiltration and Treatment Facility; North of Westchester Parkway, east of Pershing Drive	Los Angeles International Airport	Also referred to as the Westchester Stormwater Best Management Practices Project, this includes a 22-acre stormwater infiltration facility.
77	Canine Facility	Los Angeles International Airport	New canine facility for Airport Police Department
78	Secured Area Access Post	Los Angeles International Airport	Construction of fully functioning access point on the west side of LAX
79	Airport Security Buildings	Los Angeles International Airport	Relocation of LAWA Police Department to LAX Northside, potentially including a shooting range
80	Concourse 0; east of Terminal 1 at the current location of Park One surface parking lot	Los Angeles International Airport	660,000 s.f. of building area, including 11 aircraft gates
81	North Airfield Improvements	Los Angeles International Airport	Improvements to taxiways, installation of runway status lights, and other safety improvements
City of Hawthorne			
82	360 South Bay	SE corner of Aviation Boulevard and El Segundo Boulevard	610 residential condominium units
83	Condominiums / Office	13806 Hawthorne Boulevard	171 residential condominium units; 32,500 s.f. office
84	Prestige Villas	4500 West 116th Street	116 condominium units
85	Single Family Homes	14000 Yukon Avenue	6 dwelling units
86	Downtown Hawthorne Specific Plan	I-105 on the north, Prairie Avenue, Freeman Avenue, and its extension through residential neighborhood to the city limits on the south, and Ramona Avenue and Inglewood Avenue on the west. In addition to the major north-south arterial Hawthorne Boulevard, the DHSP area includes the east-west segments of Imperial Highway, 120th Street, El Segundo Boulevard, and Rosecrans Avenue	Net increase of 317 dwelling units and 2,166,600 s.f. of commercial, retail, and other non-residential use
87	Green Line Specific Plan Project	SE corner of Crenshaw Boulevard and Jack Northrup Avenue	230 apartment units and 3,700 s.f. retail/restaurant space
88	Civic Center		A public-private partnership opportunity that can have a mix of civic, hotel, retail, and housing use
89	South Bay Ford		A mid-scale mixed-use development that helps catalyze the southern portion of Hawthorne Boulevard. Medium and higher density residential development
90	Hawthorne Mall Site		Proposed retail outlet replacing a currently shuttered mall
91	Icon at Rosecrans	14135 Cersie Avenue	127 apartment units
92	Marriott Hotels (Courtyard and TownePlace Suites)	4427 El Segundo Blvd.	350 rooms and full-service restaurant
93	Hilton Hotel (Garden Inn)	11519 Acacia Ave.	119 rooms

6.0 Cumulative Environmental Effects

	PROJECT	ADDRESS	DESCRIPTION
City of Los Angeles			
94	"O" Hotel	9800 S. Sepulveda Boulevard	Change of Use from 118,490 sf Office to 178-room hotel with restaurant and spa
95	Sterling West School	5206 W. Thornburn Street	50-student private school (Grades 3-12).
96	Apartment	7280 W Manchester Avenue	126 apartment units replacing approved 24,000 s.f. mixed-use development.
97	Proposed Airport Parking	6225 W Century Boulevard	1,726-stall airport parking with shuttle bus service.
98	MTA Bus Facility	10701 S. La Cienega Boulevard	MTA bus facility at LAX parking lot B
99	LMU Master Plan	1 LMU Drive	Increase enrollment capacity to 7,800 students.
100	Mixed-Use: Apartment & Retail	7407 S. La Tijera Boulevard	140 apartment units. 2,600 s.f. retail
101	Chick-fil-A	8521 S. Sepulveda Boulevard	3,999 s.f. fast food restaurant with drive-through
102	OTIS College of Arts & Design	9045 S. Lincoln Boulevard	Relocation and consolidation of existing campus
103	Apartment	8740 S. La Tijera Boulevard	137 apartment units to replacing existing 215-student charter school
104	Starbucks Coffee Shop	8400 S. Lincoln Boulevard	Starbucks Coffee Shop (without drive through) within existing shopping center
105	Charter Middle School	8540 S. La Tijera Boulevard	525-student middle school
106	Howard Hughes Center	6801 Center Drive	600 apartment units and 488,659 s.f. remaining development potential
107	LAX Northside Project	Westchester Parkway b/t Pershing Drive and Sepulveda Boulevard	2.32 million s.f. of office, R&D, community/civic uses, recreation, and open space.
108	Mixed-Use: Apartment & Automotive Dealership	5747 South Mesmer Avenue	400 apartment units; & 250,000 s.f. showrooms for 5 automotive dealerships
109	Charter Middle School	8705 S Western Avenue	616 students
110	Apartments	6733 Sepulveda Boulevard	176 apartment units
111	Apartments	6711 S Sepulveda Boulevard	180 Units
112	New Smart & Final Supermarket	6855 S La Cienega Boulevard	22,590 s.f. construction on vacant parking lot
113	Chick-Fil-A Fast Food Restaurant	5208 W Centinela Avenue	4,642 s.f.
Unincorporated Los Angeles County			
114	Proposed Aviation Station Project	11604 Aviation Boulevard	Lot 1: 281 residential condominium/townhouse units, 5,000 s.f. retail/commercial; Lot 2: 112 apartment units; 21,500 s.f. retail/commercial.
115	Senior Housing	1252 W 105th Street	74 affordable senior housing units
116	Athens Vista Apartments	1248 W 105th Street	74 apartment units
117	Apartment	5550 S La Brea Avenue	32 apartment units
118	Hotel	11814 Aviation Boulevard	128-room hotel
119	Apartment	1743 Imperial Highway	39 apartment units
120	Condominiums	1423 W 120th Street	57 residential condominium units
121	Apartment	1509 W 102nd Street	12 apartment units

PROJECT		ADDRESS	DESCRIPTION
122	Apartments	11824 Aviation Boulevard	36 apartment units; 58 parking spaces, 28 bicycle parking spaces
123	Hotel	11814 - 11816 Aviation Boulevard	15,821 s.f. addition to hotel
124	Apartments	10505 Hawthorne Boulevard	32 apartment units
125	Apartments	10609 S Inglewood Avenue	9 apartment units
126	Condominiums	5101 Overhill Drive	88 residential condominium units
127	Apartments	1240 W 105 St	42 apartment units
City of Culver City			
128	Entrada Creative Office	6161 W. Centinela Boulevard	342,000 s.f. 13-story office building to replace existing surface parking lot
129	Mixed Use	6221 Bristol Parkway	750 apartment units 21,000 s.f. retail replacing existing 60,157 s.f. retail
130	Retail/Office	5450 Sepulveda Boulevard	14,000 s.f. commercial/retail building
131	Airport Marina Ford	6002 Centinela Avenue	27,568 sq. ft. addition of 29 service bays and 12,900 sq. ft. of parts and service
132	Orchard Supply Hardware	11441 Jefferson Boulevard	Conversion of 12,737 s.f. within an existing 36,538 sq. ft. multi-tenant commercial building to hardware store and conversion of existing 4,988 s.f. paint store into indoor nursery area
133	C3 - Office & Retail Building	700-701 Corporate Pointe (Now 5800 Bristol Parkway and 5801 Hannum Ave)	7-story 281,400 s.f. office building and 9-story parking structure
134	Commercial	5645 Sepulveda Boulevard	4-story office building; 3,193 sq. ft. retail on ground floor and 38,712 sq. ft. medical office, 198 subterranean parking spaces replacing existing 5,000 s.f. building.
135	Boutique Hotel	11469 Jefferson Boulevard	5-story hotel of 183 room hotel with restaurant and outdoor dining replacing 12,958 sq. ft. shopping center
136	Bristol Parkway Mixed Use	6201 Bristol Parkway	16,000 sq. ft. of commercial retail/restaurant space, 775 residential units 850 parking spaces Replaces existing 60,000 s.f. shopping center
City of El Segundo			
137	Raytheon Campus Specific Plan Office Park Expansion	2100 El Segundo Boulevard	2,142,457 s.f. expansion to existing 2,089,000 s.f. office park (total building area: 4,231,547 s.f.)
138	Hotel	888, 892 and 898 N. Sepulveda Boulevard	Replace existing 840-space parking structure with 190-room, 107,090 s.f. hotel; operate Airport Park and Ride facility
139	Convert existing warehouse to office	2265 E. El Segundo Boulevard	Convert 3,050 s.f. existing warehouse to office use
140	Wiseborn School District H.S.	201 N. Douglas	Expansion of existing high school to 335,000 s.f. for 1,200 students.
141	Hotel	199 Continental Boulevard	152 rooms replacing existing 71,000 s.f. parking lot

6.0 Cumulative Environmental Effects

	PROJECT	ADDRESS	DESCRIPTION
142	Office	400 Duley Road	73,000 s.f. office
143	Hotel	525 N. Sepulveda	Add 6,952 s.f. to 98,548 s.f. existing hotel
144	Corporate Office and Athletic Training Facility	2275 Mariposa Avenue	52,000 s.f. office and 68,380 s.f. athletic training facility
145	Office	500 S. Douglas and 2330 Utah Avenue	78,000 s.f. office to replace existing 52,000 s.f. industrial use.
146	Office and Private Hotel	2125 Campus Drive	121,450 s.f. hotel and 63,550 s.f. office
147	Office Boeing S-50 Building Addition	1700 E. Imperial Avenue	Addition of 96.898 s.f. to existing 169,390 s.f. Building
148	Data Center / Office	445 N Douglas Street	223,000 s.f. (106,000 s.f. office and 117,000 s.f. warehouse/industrial data center
149	Office	2350 E El Segundo Boulevard	1,740.000 s.f. office, 75,000 s.f. retail, 7,000 s.f. childcare center, 7,000 s.f. medical/dental office, 19,000 s.f. health club, 75,000 s.f. restaurant, 100-room hotel, 25,000 s.f. light industrial, 75,000 s.f. R&D, 65,000 s.f. technology/telecommunications
150	El Segundo Corporate Campus	710 N. Nash Street	611,545 s.f. office and 13,660 s.f. retail
151	Office	1950 E. Grand Avenue	93,569 s.f. office.
152	Hotel	101 Continental Boulevard	167-room hotel.
153	Data Center / Office	444 N. Nash Street	Demolish 11,769 s.f. and construct 75,435 s.f. for a total of 180,422 s.f. data center
154	LA Air Force Base - Area A	SE Aviation Boulevard	525 residential condominium units replacing existing 835,000 s.f. office
155	Hotel	1960 E. Grand Avenue	150-room hotel.
155	Mattel Grand Way Project - Phase II	455 Continental Boulevard and 1955 E. Grand Avenue	14-story 300,000 s.f. R&D office tower and 810-space parking structure
156	Warehouse, Office, Manufacturing	900, 950 Sepulveda Boulevard & 960, 901 - 915 Selby Street	20,819 s.f. warehouse, 139,558 s.f. office, 14,025 s.f. manufacturing replacing existing 80,165 s.f. warehouse, 72,084 s.f. office, 2,554 s.f. manufacturing.
157	Indoor Ice Rink	555 N. Nash Street	17,315 s.f. indoor ice rink.
158	Office	2130 E. Maple Avenue	20,955 s.f. office

Sources:

City of Inglewood

Traffic Study for the Landside Access Modernization Program (LAMP) DEIR, September 2016

Los Angeles County Department of Regional Planning website

City of Hawthorne, Planning Department website

6.3 ANALYSIS OF CUMULATIVE ENVIRONMENTAL EFFECTS

6.3.1 LAND USE AND PLANNING POLICY

Would the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans, in conjunction with past, present, and reasonably foreseeable probable future projects, result in cumulatively considerable land use impacts?

a. Physical Division of a Community

The cumulative study area related to division of a community would include all areas within Inglewood and the areas within the cities of Los Angeles and Hawthorne, as well as unincorporated County that are adjacent to the Westchester/Veterans and Crenshaw/Imperial areas.

The analysis set forth in Section 3.3, *Land Use and Planning Policy*, concludes that the proposed TOD Plans would not result in any impacts related to physical division of an established community. Pursuant to CEQA Guidelines Section 15130(a)(1), because the proposed TOD Plans would have no impacts, any cumulative impacts would not result even in part from the TOD Plans. Further analysis of cumulative impacts is therefore unnecessary.

b. Consistency with Applicable Planning Policies

The cumulative study area related to division of a community would include all areas within Inglewood and the areas within the cities of Los Angeles and Hawthorne, as well as unincorporated County that are adjacent to the Westchester/Veterans and Crenshaw/Imperial areas.

The analysis set forth in Section 3.3, *Land Use and Planning Policy*, concludes that the proposed TOD Plans would not result in any impacts related to consistency with applicable policies. Pursuant to CEQA Guidelines Section 15130(a)(1), because the proposed TOD Plans would have no impacts, any cumulative impacts would not result even in part from the TOD Plans. Further analysis of cumulative impacts is therefore unnecessary.

6.3.2 POPULATION, HOUSING, AND EMPLOYMENT

Would the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans, in conjunction with past, present, and reasonably foreseeable probable future projects, induce substantial unplanned population growth?

Because both TOD Plan areas are close to the Inglewood City limits, the geographic context for an analysis of cumulative impacts would be Los Angeles County. As described in Section 3.4, *Population, Housing, and Employment*, past and present development projects have resulted in the population levels and housing inventory that exist for the County as of the date of this document. In the last 15 years, these developments have been within the overall population and housing projections for the County, and future County projections (shown in **Table 3.4-2**) indicate substantial growth projections (between 11 and 13 percent) for the County through 2040.

The proposed TOD Plans would result in development of new land uses that would, in combination with other cumulative development in the area, increase population, housing, and employment in Los Angeles County. Such growth would be generally consistent with the Connect SoCal sustainable communities strategy and local General Plan policies. As a result, cumulative development would not induce substantial unplanned population growth and result in a significant cumulative impact to which the proposed TOD Plan might contribute.

6.3.3 CULTURAL AND TRIBAL CULTURAL RESOURCES

Would the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans, in conjunction with past, present, and reasonably foreseeable probable future projects, result in significant effects on cultural or Tribal cultural resources?

Cumulative effects involving cultural resources occur as the result of multiple projects affecting cultural resources involving a resource type or theme, such as historic ethnic sites or an industry (e.g., railroads), that occur within a larger geographic context than a site-specific development project site. Thus, this analysis considers cumulative development projects that are located immediately adjacent to the Westchester/Veterans and Crenshaw/Imperial TOD Plan areas.

a. Historic Resources

Urban development that has occurred over the past several decades in Los Angeles County has resulted in the demolition and alteration of historical resources and their physical context. It is reasonable to assume that present and probable future development activities will involve similar impacts. Because historical resources are unique and nonrenewable members of finite classes, each adverse effect or negative impact erodes a dwindling resource base. Federal and

state laws and regulations exist to protect historical resources. However, it is not always feasible to protect historical resources, particularly when an historic building or structure has deteriorated beyond repair. For this reason, the cumulative effects of development on historical resources from cumulative projects in Los Angeles County are considered significant.

Proposed TOD Plans' development requirements include provisions related to preservation of historic resources. In addition, implementation of Mitigation Measure CUL-1 would avoid demolition of historically significant structures and require adaptive reuse of historically significant structures to comply with Secretary of the Interior Standards and thereby protect the historic integrity of the structure's façade. Mitigation Measure CUL-1 also protects the physical characteristics of an historical resource and those of its physical setting that convey historical significance. Thus, with the application of Mitigation Measures CUL-1 and applicable historic design standards in the TOD Plans, the proposed Plans' contribution to a significant cumulative effect on historic resources in Los Angeles County would be less than cumulatively considerable.

b. Archaeological Resources

Based upon existing studies documenting extensive ground disturbance and loss of cultural resources, as well as the documented, observable material culture (i.e., artifacts) recovered from the prehistoric era to the present, Los Angeles County is known to have high archaeological sensitivity. For this reason, there is a possibility that ground-disturbing activities during future construction of cumulative projects may uncover or disturb known or previously unknown archaeological resources. However, cumulative development projects would be required to undergo environmental review, which would establish requirements for avoidance or mitigation of impacts to known resources. In addition, the likelihood of uncovering multiple currently unknown resources within previously developed areas sufficient to create a significant cumulative impact is extremely low. Thus, the cumulative effects of development on archaeological resources from cumulative projects in the County would be less than significant.

c. Tribal Cultural Resources

The cumulative context for Tribal cultural resources is the Gabrieliño Tribal territory, which encompasses land within Los Angeles County north to Thousand Oaks, east to Pomona, west to the coast and south to Long Beach. Their territory also extends into Orange County as far south as Costa Mesa. Inglewood and adjacent cities are within the Gabrieliño Tribal territory and have been subject to historic development within the City since the rancho period, with more wide scale development occurring at the turn of the century.

The Gabrieliño Tribal territory has been subject to extensive development projects over the past several decades and is currently experiencing a high level of redevelopment projects. Known

Tribal village locations, trade routes, and known significant prehistoric archaeological sites that have a higher potential to represent a Tribal cultural resource have been documented within the Inglewood and surrounding communities. As such, development in these areas could have a significant impact to a Tribal cultural resource. Cumulatively, the large amount of past development within the Tribal territory, especially development within known village locations, trade routes, and known significant prehistoric archaeological sites has had a cumulatively significant impact to Tribal cultural resources. Present and reasonably foreseeable probable future projects would, such as the TOD Plans and the cumulative projects identified in **Table 6-1**, could result in ground-disturbing activities resulting in further loss of tribal cultural resources.

Some of the cumulative development projects listed in **Table 6-1** are near historical Native American trade routes or villages or waterways and could result in cumulatively significant impacts to Tribal cultural resources. Site-specific development projects within the TOD Plan areas would cause ground disturbance that could result in a significant impact on a previously unknown Tribal cultural resource and thus contribute to the cumulatively significant impact on Tribal cultural resources. However, due to required implementation of AB 52 and Mitigation Measure CUL-3, the TOD Plan's contribution to the significant cumulative impact would be less than cumulatively considerable.

d. Discovery of Human Remains Outside of a Formal Cemetery

Treatment of human remains is governed by standard regulatory requirements set forth in the California Public Health and Safety Code and Public Resources Code. Compliance with these regulations, which is required for all development in the State of California, would ensure that cumulative disturbance of human remains would not occur. Thus, the cumulative effects to disturbance of human remains would be less than significant.

6.3.4 TRANSPORTATION

Would the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans, in conjunction with past, present, and reasonably foreseeable probable future projects, cause a cumulative transportation impact?

The geographic context for cumulative transportation impacts encompasses the City of Inglewood and surrounding communities, including the cumulative projects identified in **Table 6-1**.

a. Conflict with an applicable program, plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Cumulative development projects would be subject to site-specific reviews that would address consistency with adopted policies, plans and provisions related to public transit, bicycle facilities and pedestrian facilities. Because cumulative development projects would be required to be consistent with these plans, cumulative impacts would be less than significant.

b. Consistency with CEQA Guidelines Section 15064.3(b)

The proposed TOD Plans, in combination with the cumulative projects identified in **Table 6-1**, would increase travel demand and resulting *total* vehicle miles travelled due to increased population, housing, and employment. As identified in the Connect SoCal sustainable communities strategy, continuation of existing development patterns and intensities would result in a substantial increase in vehicle miles traveled and resulting greenhouse gas emissions. A significant cumulative impact would therefore result in relation to vehicle miles traveled and consistency with CEQA Guidelines Section 15064.3(b).

As demonstrated in Section 3.7, *Transportation*, the mixed-use development proposed in the TOD Plan areas would substantially lower average daily vehicle miles traveled (VMT) per service population within both TOD Plan areas. This due to the location of the Westchester/Veterans and Crenshaw/Imperial areas within one-half mile of major transit stops along the Metro Crenshaw/LAX line and Green line, respectively; improved access to the stations; and improved pedestrian and bicycle facilities provided for in the TOD Plans. The TOD Plans' contribution to the significant cumulative impact would therefore be less than cumulatively considerable.

c. Substantially Increase Hazards due to Design

An analysis of the cumulative effects of traffic generated by the TOD Plans in combination with past, present, and reasonably foreseeable future probable future development on freeway off-ramps within and near the TOD Plan areas. Such increased traffic would not result in traffic backing up from off-ramps onto the freeway mainline. Thus, no significant cumulative impact would result.

The evaluation of Impact TRA-3.2 concluded that the proposed TOD Plans would have no impact in relation to hazards due to roadway design. Pursuant to CEQA Guidelines Section 15130(a)(1), because the proposed TOD Plans would have no impacts, any cumulative impacts would not result even in part from the TOD Plans. Further analysis of cumulative impacts is therefore unnecessary.

d. Result in Inadequate Emergency Access

The geographic context for cumulative analysis in relation to emergency access is the TOD Plan areas and adjacent lands.

Each cumulative development project would be subject to standard requirements and site-specific review, including review by police and fire protection authorities that would ensure emergency access needs are met. Because cumulative development projects would be required to provide for adequate emergency access, cumulative impacts would be less than significant.

6.3.5 AIR QUALITY

Would the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans, in conjunction with past, present, and reasonably probable projects, result in significant effects to air quality?

The cumulative impact analysis area for air quality is the South Coast Air Basin. The following cumulative impact analysis is based Connect SoCal RTP/SCS.

a. Conflict with or Obstruct Implementation of the Applicable Air Quality Plan

According to Connect SoCal, the regional RTP/SCS, projected growth in Southern California would result in a less than significant cumulative air quality impact related to the potential to conflict with or obstruct implementation of the adopted AQMPs/Attainment Plans in the SCAG region. This is because the projected long-term emissions of regional growth are in alignment with the AQMPs, which is demonstrated in plan's transportation conformity analysis. The emissions resulting from Connect SoCal are within the applicable emissions budgets for the South Coast Air Basin for all milestone, attainment, and planning horizon years. Cumulative impacts would therefore be less than significant.

b. Potential to Violate any Air Quality Standard or Contribute Substantially to an Existing or Projected Air Quality Violation

Construction Impacts

Implementation of the proposed TOD Plans, when taken into consideration with other development and infrastructure projects within the South Coast Air Basin, would have the potential to result in a significant cumulative impact to violating an air quality standard or contributing substantially to an existing or projected air quality violation from construction emissions. This is due to the large number of construction projects that would occur within the Air Basin on a daily basis cumulatively exceeding applicable impact thresholds.

Because (1) the proposed TOD Plans represent a very small portion of regional growth, (2) would build out over a 20-year time period such that the TOD Plans' construction activities would not likely occur on a daily basis throughout the buildout period, and (3) construction impacts of the proposed TOD Plans were determined to be less than significant, the contribution of the proposed TOD Plans to the cumulatively significant regional impact would be less than cumulatively considerable.

Operations Impacts

Projected long-term operations emissions were determined in Connect SoCal to have a less than significant cumulative impact because Connect SoCal is consistent with the local air quality management plans and state implementation plans. The modeling of emissions was inclusive of all potential air emissions in the SCAG region that could occur as a result of Connect SoCal.

c. Result in a Cumulatively Considerable Net Increase of any Criteria Pollutant for which the Project Region is in Non-attainment

Connect SoCal determined that a less than significant cumulative impact would occur in relation to increasing any criteria pollutant that is in nonattainment. Connect SoCal also determined that cumulative growth would not contribute to a net increase in the pollutants for which the Air Basin is in non-attainment and would be within the emission budgets set by the AQMP and State Implementation Plan in the SCAG region.

d. Expose Sensitive Receptors to Substantial Pollutant Concentrations

Connect SoCal concluded that even with regional strategies to improve public health, a significant cumulative impact would result by exposing sensitive receptors to substantial pollutant concentrations that could harm public health outcomes. While Connect SoCal aims to concentrate new growth around transit nodes and along transit corridors, a small percentage of new development would occur within 500 feet of freeways and high-volume roadways. Despite significant long-term reductions in mobile source emissions from new development, the cancer risk threshold as measured at various receptor locations within 500 feet of freeways and high-volume roadways would be exceeded at several locations.

As discussed in Section 3.8, *Air Quality*, of this EIR, the types of uses proposed in the TOD Plans do not include those that would emit TAC emissions in appreciable quantities. However, the TOD Plans each permit new residential uses within 500 feet of a freeway. Implementation of Mitigation Measure AQ-4.1a would ensure health risks associated with any residential within 500 feet of a freeway that might be permitted by the TOD Plans would not have a substantial adverse health effect. Thus, the TOD Plans would have a less than cumulatively considerable contribution to the regionally significant impact.

e. Expose a Substantial Number of People to Objectionable Odors

Because all new development project would be required to comply with odor regulations as prescribed by the South Coast Air Quality Management District and local municipalities, a less than significant cumulative impact to exposing a substantial number of people to objectionable odors would occur.

6.3.6 GREENHOUSE GAS EMISSIONS**Would the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans, in conjunction with past, present, and reasonably foreseeable probable future projects, generate greenhouse gas emissions that would have a significant cumulative impact on the environment?**

Greenhouse gas (GHG) emissions impacts are assessed in a cumulative context since no single project can cause a discernible change to climate. Climate change impacts are the result of incremental contributions from natural processes, and past and present human-related activities. Therefore, the area in which a proposed project in combination with other past, present, or future projects, could contribute to a significant cumulative climate change impact would not be defined by a geographical boundary such as a project site or combination of sites, city, or air basin. GHG emissions have high atmospheric lifetimes and can travel across the globe over a period of 50 to 100 years or more. Even though the emissions of GHGs cannot be defined by a geographic boundary and are effectively part of the global issue of climate change, CEQA places a boundary for the analysis of impacts at the state's borders. Thus, the geographic area for analysis of cumulative GHG emissions impacts is the State of California.

Climate change is the cumulative effect of all natural and anthropogenic sources of GHGs accumulated on a global scale. The GHG emissions from an individual project, even a very large development project, would not individually generate sufficient GHG emissions to measurably influence global climate change, and thus the assessment of GHG emissions impacts is inherently cumulative. That the State of California has set emissions reduction targets through AB 32 and SB 32 is indicative of a significant cumulative impact requiring mitigation.

The increased development permitted by the proposed TOD Plans would generate emissions of GHGs from construction and from traffic, energy use, and other operations of new site-specific developments. However, GHG emissions from buildout of the TOD Plans, including construction and operational emissions would be substantially less than 40 percent below 1990 per service population emissions for the City of Inglewood, which is reflective of the increased development intensity in transit-oriented mixed-use settings provided by the TOD Plans, along with the TOD Plans' proposed improvements to maximize bicycling and walking.

Therefore, the proposed TOD Plans would make a less than considerable contribution to the significant cumulative greenhouse gas emissions impact.

6.3.7 ENERGY RESOURCES

Would the Westchester/Veterans and Crenshaw/Imperial TOD Plans, in conjunction with past, present, and reasonably foreseeable probable future projects, large amounts of energy or fuel, or consume energy or fuel in a wasteful manner?

The geographic context for analysis of cumulative impacts regarding energy includes past, present, and probable future development within southern California because energy supplies (including electricity, natural gas, and petroleum) are generated and distributed throughout the southern California region. All development projects throughout the region would be required to comply with the energy efficiency standards in CalGreen/Title 24 and Low Impact Development requirements. Additionally, some future development projects could provide for additional reductions in energy consumption by use of solar panels, sky lights, or other LEED® type energy efficiency infrastructure in excess of these requirements. Adherence to existing energy conservation regulations would avoid cumulatively wasteful electricity and natural gas consumption.

Petroleum consumption associated with the TOD Plans, in combination with past, present, and probable future development projects would be primarily attributable to transportation, especially vehicular use. However, pursuant to Connect SoCal, development patterns throughout the region would provide for greater use of transit and alternative modes of transportation from development of new mixed-uses that allow residents to work, shop, and live within a small area, reducing average trip lengths, which would in turn result in lower rates of fuel consumption. These considerations would reduce wasteful petroleum consumption associated with unnecessary automobile trips and long commutes. State fuel efficiency standards and alternative fuels policies would also contribute to a reduction in overall fuel use.

In addition, modifications to CEQA Guidelines pursuant to SB 743 that are effective July 1, 2020 identify substantial increases in vehicle miles travelled (VMT) as a mandatory CEQA significance threshold. The intent of this new threshold is to reduce VMT within the region, including increasing transit usage and decreasing per capita energy consumption for vehicular travel.

Other existing regulations are likely to result in more efficient use of all types of energy, and reduction in reliance on non-renewable sources of energy over the next 20+ years. These include the federal Energy Independence and Security Act and the state Long Term Energy Efficiency Strategic Plan (described in Section 3.10, *Energy Resources*), which are designed to reduce reliance on non-renewable energy resources and reduce demand by providing federal tax

credits for purchasing fuel-efficient items. For these reasons, the consumption of petroleum would not occur in a wasteful manner and would be less than cumulatively considerable.

6.3.8 NOISE AND VIBRATION

Would the Westchester/Veterans and Crenshaw/Imperial TOD Plans, in conjunction with past, present, and reasonably foreseeable probable future projects, expose people to or generate excessive ambient noise levels, groundborne vibration, or groundborne vibration noise?

The geographic area considered for cumulative traffic noise analysis includes the City of Inglewood and surrounding communities. The cumulative development program assumed in the traffic forecasts used in the noise modeling effort includes projected socioeconomic growth over the next 20 years, including known cumulative projects at the time the noise analysis was undertaken.

- a. **Generate substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local (City of Inglewood) general plan or noise ordinance, or applicable standards of other affected agencies.**

Construction Impacts

Cumulative noise impacts would occur if construction activities associated with cumulative projects were to overlap in close physical proximity. Because of the low likelihood of two or more site-specific developments both being under construction simultaneously within proximity to the same sensitive use, cumulative impacts would not be significant.

Operations Impacts

As shown in **Table 3.11-14**, roadway segments where future cumulative without project noise levels range in the low 70's dBA CNEL are near commercial, office, and mixed-use zones. These noise levels are slightly higher than existing noise levels but still are classified as Conditionally Acceptable. Similarly, roadway segments where cumulative future without project noise levels that approach 65 dBA CNEL are in land use zones for residential areas, also increase above existing noise levels. Development permitted by the TOD Plans would increase noise levels by a maximum of 1.0 dBA CNEL, which would not exceed the noise limits in the City's Municipal Code. Thus, cumulative impacts related to traffic noise increases to sensitive receptor locations would be less than significant.

b. Generate excessive groundborne vibration or groundborne noise levels.

Cumulative vibration impacts principally occur from two conditions. First, a project, together with other past, present, and reasonably foreseeable probable future projects that include vibration-generating operational sources, could combine to expose receptors to cumulative operational vibration impacts. The only operational source of groundborne vibration anticipated within or near the TOD Plan areas are the Metro Crenshaw/LAX and Green lines. As noted in Section 3.10, *Noise and Vibration*, vibration impacts from the Metro lines would be less than significant. Thus, any cumulative impact related to vibration would need to include construction sources of vibration. As further discussed in Section 3.10, vibration from construction sources dissipates quickly over distance. Because of the low likelihood of two or more site-specific developments both being under construction simultaneously within 50 feet of a sensitive use, cumulative impacts would not be significant.

c. Expose people residing or working in the project area to excessive airport-related noise levels.

Cumulative development projects permitted would expose people to airport-related noise levels from LAX above 65 dB CNEL. Compliance with applicable noise compatibility and development standards for use proposed within a 65 dB CNEL noise contour would avoid significant cumulative impacts in relation to exposing people to excessive airport-related noise levels.

6.3.9 HAZARDS AND HAZARDOUS MATERIALS

Would the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans, in combination with past, present, and reasonably foreseeable probable future projects, result in significant effects with respect to hazards and hazardous materials?

The geographic context for analysis of cumulative impacts regarding transport of hazardous materials includes past, present, and future development within Los Angeles County, since hazardous materials from throughout the County could be transported through the TOD Plan areas.

a. Hazardous Materials

Cumulative land use changes within Los Angeles County and the City of Inglewood would have the potential to expose future area residents, employees, and visitors to chemical hazards through redevelopment of sites and structures that may be contaminated from either historic or ongoing uses. The severity of potential hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual

sites. However, all hazardous materials users and transporters, as well as hazardous waste generators and disposers are subject to regulations that require proper transport, handling, use, storage, and disposal of such materials to ensure public safety.

Thus, if hazardous materials are found to be present on present or future cumulative project sites, appropriate remediation activities would be required pursuant to standard federal and state regulations. Compliance with the relevant federal, state, and local regulations during the construction and operation of related projects would ensure that cumulative impacts from the routine transportation, use, disposal, or accidental release of hazardous materials would be less than significant.

b. Airport Safety Hazard

As discussed in Section 3.12, *Hazards and Hazardous Materials*, the southwestern portion of the Westchester/Veterans TOD Plan area is located within 2 miles of Los Angeles International Airport (LAX) for which an airport land use plan has been adopted. The TOD Plan area is within the 65 dB CNEL for LAX but is outside of identified safety zones. The Crenshaw/Imperial TOD Plan area is outside of the airport influence area for the Hawthorne Municipal Airport. As a result, the TOD Plans would have no impact related to airport hazards and further cumulative analysis is not necessary.

c. Emergency Response

In regard to emergency response and evacuation plans, cumulative projects would be required (per required construction permits and Fire Department regulations) to provide adequate access during construction activities for vehicular, pedestrian, and bicycle circulation and emergency vehicles. In addition, new development throughout the City and the County is required to comply with the California Building Code standards, which provide for safety, access, and evacuation measures. As a result, cumulative impacts related to interference with an emergency response plan or evacuation route would be less than significant.

d. Wildland Fire

As discussed in Section 3.12, *Hazards and Hazardous Materials*, the City of Inglewood is a built-out urban community and future site-specific development within the TOD Plan areas would not interface with any wildlands or an area classified as a Fire Hazard zone. As a result, the TOD Plans would have no impact related to exposure of people to wildland fires and further cumulative analysis is not necessary.

6.3.10 HYDROLOGY AND WATER QUALITY

Would the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans, in combination with past, present, and reasonably foreseeable probable future projects, degrade water quality or increase flooding?

a. Water Quality

The geographic scope for cumulative impacts related to hydrology and water quality includes the Ballona Creek Watershed because the condition of the waterbody is impaired and both cumulative projects and developments permitted by the proposed TOD Plans could incrementally exacerbate the existing impaired condition and could result in new pollutant related impairments.

Related developments within the urban and developed Ballona Creek Watershed would be required to implement LARWQCB measures pursuant to the same SWRCB Construction General Permit that requires implementation of a SWPPP (for construction), a WQMP (for operation) and BMPs for both to eliminate or reduce the discharge of pollutants in stormwater discharges, reduce runoff, reduce erosion and sedimentation, increase filtration and infiltration.

The Ballona Creek Watershed is urban in character and largely covered with impervious surfaces. Thus, future development would not likely result in a major increase of impervious surface area but may increase groundwater infiltration in order to meet regional runoff permit requirements. As described in Section 3.12, *Hydrology and Water Quality*, regional permit requirements have been set by the State Water Board and implemented by the LARWQCB to reduce incremental effects of individual projects so that they would not become cumulatively considerable. Therefore, overall potential impacts to water quality associated with past, present, and probable future development in the watershed would not be cumulatively considerable with compliance with all applicable laws, permits, ordinances and plans.

As a result, the cumulative impact of related projects would be less than significant.

b. Groundwater Basin

The geographic scope related to groundwater supplies and recharge includes the West Coast Groundwater Basin because it is the groundwater basin within the project region and provides water supplies to the City and TOD Plan areas.

Groundwater rights for the West Coast Groundwater Basin have been adjudicated, which has regulated groundwater supplies and identifies the natural safe yield that can be withdrawn from the aquifer without adverse effect, after considering natural replenishment from runoff and precipitation.

During the 2016-2017 water year (which runs from July 1 to June 30), parties to the adjudication had a total water use of 189,187 acre-feet of water in comparison to adjudicated rights of 64,468.25 acre-feet from the basin. The total water use of 189,187 acre-feet was met with 26,805 acre-feet of water extracted from the basin, 23,317 acre-feet of recycled water, and 139,075 acre-feet of imported water.

The Watermaster's management of the adjudicated basin and the prescriptive allowable pumping rights for each agency that accesses the groundwater basin eliminates the potential of incremental increases to groundwater pumping that could result in a significant cumulative impact on the groundwater basin, since the Watermaster is required to import water supplies as necessary to maintain water balance in the basin.

Because the West Coast Groundwater Basin is urban in character and largely covered with impervious surfaces, it is not likely there would be major increases in impervious surfaces as the result of future development. However, cumulative development projects could potentially increase pervious surfaces in order to meet regional runoff permit requirements, which could increase water infiltration into the groundwater basin as the result of requirements for water quality management and detention of any increases in stormwater runoff. As a result, impacts related to cumulative projects and water infiltration into the groundwater basin would be less than significant.

6.3.11 GEOLOGY, SOILS, AND SEISMICITY

Would the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans, in combination with past, present, and reasonably foreseeable probable future projects, result in significant effects with respect to geology, soils, or seismicity?

a. Soils, Geology, and Seismicity

The geographic context for exposure of people and structures to seismic hazards (other than surface rupture of a fault) encompasses the Southern California region because earthquakes and their direct effects (groundshaking, liquefaction, and ground failure) tend to be regionwide in nature, even though individual site-specific developments may have unique geologic considerations. Cumulative development projects would be subject to construction standards imposed by the California Building Code (CBC) and local communities throughout the region based on site-specific geotechnical studies prepared to define site-specific conditions. While increases in the number of people and structures subject to seismic hazards will be substantial throughout Southern California, given the application of CBC requirements, the cumulative effects of development related to geology and seismic hazards would be less than significant.

In relation to the cumulative effects of potential erosion and siltation, a watershed-wide geographic context is appropriate because direct effects (turbidity, reduction of water quality, channel bed sedimentation) can affect all downstream reaches of a waterway system. The potential for cumulative impacts to occur is limited because all development is required to follow the California Building Code and NPDES-related grading requirements. These measures would be implemented requirements for cumulative project development and are subject to continuing enforcement. As a result, cumulative impacts caused by runoff and erosion would be less than significant.

b. Paleontological Resources and Unique Geologic Features

Based upon the geologic history of the non-desert portion of Los Angeles County, and the high paleontological sensitivity of some rock units within this area, there is the possibility that ground-disturbing activities during future construction may uncover previously unknown paleontological resources. Therefore, the cumulative effects of development on paleontological resources from cumulative projects are considered significant. However, cumulative development would be required to undergo environmental review, which would establish requirements for avoidance or mitigation of impacts to known resources. In addition, the likelihood of uncovering multiple currently unknown resources within previously developed areas sufficient to create a significant cumulative impact is extremely low. Thus, the cumulative effects of development on paleontological resources from cumulative projects in the region would be less than significant.

6.3.12 PUBLIC SERVICES AND FACILITIES

Would the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans, in combination with past, present, and reasonably foreseeable probable future projects, result in substantial adverse physical impacts associated with the provision of new or physically altered public service facilities, need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives?

Cumulative public service impacts, including police, fire protection, schools, and libraries, would result when past, present, and reasonably foreseeable probable future projects combine with the proposed modernization and zero waste program to increase demand on public services facilities such that additional facilities must be constructed to maintain acceptable levels of service, and the construction of such facilities would result in a physical impact on the environment.

a. Police

The geographic context for cumulative police services is the City of Inglewood, which is the service area of the Inglewood Police Department. As described in Section 3.3, *Population, Housing, and Employment*, SCAG estimates that Inglewood's population will increase by an overall 6.79 percent between 2020 and 2040, which will generate a proportional increase in calls for police services. As described in Section 3.14, *Public Services and Facilities*, existing Police Department facilities are anticipated to be adequate to serve the City in the future. Cumulative projects would be reviewed by City Police Department staff prior to development permit approval to ensure adequate security measures are provided for each site-specific cumulative development project in the City. Because the City of Inglewood is currently urbanized and future site-specific cumulative development projects would consist of infill development and redevelopment of existing underdeveloped sites, and not require physical expansion of the geography served by the police department, it is anticipated that future development would result in the need for additional sworn officers and equipment, but not a new or expanded station. Therefore, cumulative impacts associated with police services would not be significant.

b. Fire Protection

The geographic context for cumulative fire protection and emergency services is the City of Inglewood. As described in Section 3.3, *Population, Housing, and employment*, SCAG estimates that Inglewood's population will increase by an overall 6.79 percent between 2020 and 2040, which will generate and proportional increase in demand for additional fire protection and emergency medical services. Like the proposed TOD Plans, cumulative projects would be reviewed by the City Planning and County Fire Department staff prior to permit approval and would be required to implement fire protection design features per the California Building Code and City of Inglewood Fire Code (Chapter 6, Article 1 of the Inglewood Municipal Code) regulations that would reduce potential fire hazards. Because (1) the cumulative area has been urbanized and contains fully staffed fire stations, and (2) cumulative development projects would consist of infill development or redevelopment of existing underdeveloped sites. The cumulative effect of new development in compliance with current fire codes could result in an overall reduction of fire hazards within the area.

As development occurs within the City, the Fire Department would continue to monitor response times to ensure the stations are operating within the established level of service standards and would add staffing and equipment as necessary. However, because of the existing geographical coverage of fire stations in the area, cumulative projects are not anticipated to result in the need for a new or expanded fire station, the construction of which could result in significant impacts. Therefore, cumulative impacts would be less than significant.

c. Public Schools

The geographic context for cumulative school services is the area served by the Inglewood Unified School District (IUSD), which largely consists of the City of Inglewood. Cumulative development projects within IUSD will generate an increase in student enrollment within the District, along with a need for classroom seating capacity in local schools. IUSD's current facilities capacity is roughly twice the amount needed to house its student enrollment; however, most of this excess capacity is old and in disrepair. IUSD is engaged in making large-scale improvements to its school facilities.

All new residential and non-residential development will be required to pay statutory impact fees in accordance with Government Code Section 65995(b) to the Inglewood Unified School District to help fund construction of additional classrooms and offset any additional increases in education demand at schools. Because these fees are required by law for mitigation of impacts to schools under CEQA and presumed under the law to constitute full mitigation for impacts, the cumulative impact of cumulative development on public schools would be less than significant.

d. Public Libraries

The geographic scope for cumulative library services is the City of Inglewood, which is the area served by the existing Inglewood library. As described in Section 3.14, *Public Services and Facilities*, library usage has been declining in recent years and library service needs are changing with increasing resources being available online and the availability of high-speed internet services. Therefore, new development results in a limited need for library resources/services or square footage of library space. However, cumulative increases in population growth over time could increase the demand for library services citywide.

As described in Section 3.3, *Population, Housing, and Employment*, SCAG estimates that Inglewood's population will increase by an overall 6.79 percent between 2020 and 2040, which will generate increases in demand for library services citywide. Although demand for library services might be expected to incrementally increase proportion to the amount of cumulative development that occurs, because library use is declining due to the availability of online materials, the Inglewood Library branches that are currently providing services would be able to meet the increased need. Additionally, technology and the information available on the Internet is anticipated to increase exponentially over time, which would act to reduce the demands on library services.

Overall, cumulative development within the City of Inglewood is not anticipated to result in the need for a new or expanded library, the construction of which could result in significant

impacts. Therefore, impacts from cumulative impacts associated with library services would be less than significant.

6.3.13 UTILITIES, SERVICE SYSTEMS, AND WATER SUPPLY

Would the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans, in combination with past, present, and reasonably foreseeable probable future projects, result in significant cumulative effects associated with increased demands for utilities and service systems?

a. Water Supply

The geographic context for water supply is the City of Inglewood's water service area and the Golden State Water Company's Southwest service area.

While the City projects a surplus of entitled water supply during multiple dry years in 2040 even with development of the TOD Plans, the Golden State Water Company projects sufficient entitled water supply during multiple dry years in 2040 to meet projected demands but no additional capacity to serve the Crenshaw/Imperial TOD Plan. However, because the City projects a surplus water supply of approximately 470 AFY by 2040 and the portion of the TOD Plans within the Golden State Water Company service area would have a projected demand of 152.76 acre-feet of water annually during multiple dry years, sufficient water supplies would be available to serve development permitted by the proposed TOD Plans in combination with past, present, and reasonably foreseeable probable future projects. As a result, cumulative impacts related to water supplies would be less than significant.

b. Wastewater Generation

Cumulative wastewater infrastructure impacts are considered on a systemwide basis and are associated with the overall capacity of existing and planned infrastructure. The cumulative system evaluated includes City's sewer system and the conveyance system through wastewater disposal at the LACSD Joint Water Pollution Control Plant (JWPCP).

Due to the general age of the sewer system and to accommodate the increased demand for water resulting from increased development, wastewater treatment facilities have been assessed and the City is implementing a proactive sewer rehabilitation program that prioritizes and replaces sewer lines that have been identified as deficient, through its sewer inspection program. In addition, the City performs video inspection of its entire sewer system every 5 years. Thus, the City's regular assessment, maintenance, and upgrades of the sewer system would reduce the potential of development projects resulting in a cumulatively substantial increase in wastewater such that new or expanded facilities would be required, which could

result in an environmental impact. Thus, increases in wastewater in the City's system would result in a less than significant cumulative impact.

Additionally, the JWPCP facility processes both primary and secondary treatment for an average flow of 280 mgd and a design capacity of 400 mgd. The proposed TOD Plans would add 0.90 mgd of sewage daily to the JWPCP's daily wastewater flow, which represents 0.75 percent of the remaining treatment plant capacity. Due to the volume of excess capacity that is designed by LACSD to accommodate future regional growth, the increase in wastewater flow from the proposed TOD Plans, in combination with past, present, and probable future cumulative projects would have a less than significant cumulative impact.

c. Stormwater Drainage

The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the TOD Plan areas, from capture of runoff through final discharge points. This includes pipelines and culverts that are owned and maintained by the Los Angeles County Flood Control District (LACFCD) and the City of Inglewood. Because the cumulative area is urban, developed, and is generally covered with impervious surfaces, development of the TOD Plans, in combination with past, present, and probably future cumulative projects would not result in a substantial increase in impervious surfaces that could increase stormwater and runoff flows through the area's stormwater drainage system.

In accordance with state and regional MS4, LID, and County SUSMP regulations that require development projects to maintain pre-project hydrology, no net increase of offsite stormwater flows would occur. RWQCB Permit conditions require a hydrology/drainage study to demonstrate that all runoff would be appropriately conveyed and not leave the project sites at rates exceeding pre-project conditions, prior to receipt of necessary permits. As a result, increases of runoff from development permitted by the TOD Plans, in combination with past, present, and probable future cumulative projects related to stormwater drainage capacity would not occur, and cumulative impacts would be less than significant.

d. Landfill Capacity

The geographic scope of cumulative analysis for landfill capacity is the service area for the Sunshine Canyon Landfill, which serves the TOD Plan areas. The projections of future landfill capacity based on the entire projected waste stream going to these landfills is used for cumulative impact analysis. As presented in Section 3.15, *Utilities, Service Systems, and Water Supply*, the Sunshine Canyon Landfill has a maximum permitted capacity of 12,100 tons per day takes in an average of 7,582 tons per day and would reach full capacity by 2037. After the closure of Sunshine Canyon Landfill, the landfills listed in **Table 6-2** would be available to

dispose of regional solid waste. As shown in **Table 6-2**, substantial daily and long-term capacity is available for future increases in solid waste generated within the TOD Plan areas in combination with past, present, and probably future projects. Cumulative impacts related to landfill capacity would, therefore, be less than significant.

6.3.14 RECREATIONAL RESOURCES

Would the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans, in combination with past, present, and reasonably foreseeable probable future projects, result in cumulative impacts regarding the degradation of recreational facilities or the construction of new recreational facilities?

The geographic context for cumulative recreational use impacts includes the City of Inglewood. Municipal Code Chapter 12 Planning and Zoning, Article 30, Park Land Dedication, In-Lieu Fees and Park Development Fees requires the dedication of land at the rate of 3.0 acres per thousand persons (Municipal Code Section 12-105.5) or fees in lieu of such dedication be paid in the amount equal to each acre which otherwise would have been required to be dedicated at the median fair market value. Thus, cumulative projects within Inglewood would each be required to provide adequate parks and recreational facilities as defined in Municipal Code Section 12-105.5, or to provide fees in lieu of such dedication. As a result, adequate parks and recreation facilities would be required to satisfy cumulative demand, and cumulative impacts would be less than significant, since it would be incumbent on the City to use such funds to provide physical mitigation for recreation impacts.

6.4 REFERENCES - CUMULATIVE IMPACTS

2014 Annual Report Los Angeles County Countywide Integrated Waste Management Plan.
(County 2014) Accessed April 29, 2016:

<https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=3473&hp=yes&type=PDF>

Southern California Association of Governments (SCAG), *Connect SoCal, The 2020 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments*, September 3, 2020. Accessed on February 16, 2021. [Connect SoCal - Southern California Association of Governments](#)

<http://www.cityofhawthorne.org/homepage-planning/>

<https://ladcp.maps.arcgis.com/apps/MapJournal/index.html?appid=b06f97ccf94741fdaad27443013eead1>

7.1 INTRODUCTION

CEQA (Public Resources Code Section 21002.1(a)) establishes the need to address alternatives in an EIR as a fundamental part of the environmental review process by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is . . . to identify alternatives to the project."

Pursuant to CEQA Guidelines Section 15126.6(a), an EIR must describe a reasonable range of alternatives to the proposed project or to the project's location that would feasibly avoid or lessen its significant environmental impacts while attaining most (but not necessarily all) of the proposed project's objectives. CEQA Guidelines Section 15126.6(b) emphasizes that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly."

Pursuant to CEQA Guidelines Section 15126.6(d), discussion of each alternative presented in this Chapter is intended "to allow meaningful evaluation, analysis, and comparison with the Proposed Project." As permitted by CEQA, the significant effects of each alternative are discussed in less detail than those of the proposed project, but in enough detail to provide perspective and allow for a reasoned choice among alternatives to the proposed project. This chapter also identifies the "Environmentally Superior Alternative" as required by CEQA Guidelines Section 15126.6(e)(2).

7.2 RATIONALE FOR THE SELECTION OF ALTERNATIVES

The specific reasons for selection of each alternative addressed in this EIR or its rejection from further analysis are based on CEQA Guidelines Section 15126.6 and discussed below in Section 7.3. While CEQA requires the alternatives selected for analysis in an EIR to avoid or substantially lessen one or more significant effects of the project being evaluated, as demonstrated in Chapter 3 (Sections 3.2 through 3.16), proposed mitigation measures would reduce each of the significant environmental effects associated with development of the TOD Plans to less than significant. As a result, the alternatives selected for analysis in this EIR were selected based on the following criteria.

- The extent to which the alternative would further reduce identified less than significant environmental effects of the proposed TOD Plans;

- The ability of the alternative to meet the overarching objectives and purpose of the TOD Plans, along with the extent to which the alternative would accomplish other objectives¹. Only alternatives that could achieve the overarching objectives and the majority of other objectives were selected for further evaluation;
- The potential feasibility² of the alternative, taking into account site suitability, economic viability, availability of infrastructure, property control (ownership), and consistency with applicable plans and regulatory limitations;
- The extent to which the alternative contributes to a “reasonable range” of alternatives necessary to permit a reasoned choice between the proposed TOD Plans and alternatives;
- The extent to which the environmental effects of an alternative could be reasonably identified, and whose implementation would not be remote or speculative; and
- The requirement to consider a “no project” alternative, including an alternative that provides for the likely outcome should the proposed TOD Plans not be approved.

Neither the CEQA statute, the CEQA Guidelines, nor recent court cases specify a specific number of alternatives to be evaluated in an EIR. Rather, “the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice” (CEQA Guidelines 15126(f)).

7.2.1 PROJECT OBJECTIVES

The following identifies the Lead Agency’s objectives pursuant to State CEQA Guidelines Section 15124(b), which requires an EIR to include a “statement of objectives sought by the proposed project,” including the underlying purpose of the project. As noted in CEQA Guidelines Section 15124(b), a “clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings.”

¹ See Section 7.2.2, *Project Objectives*, for a listing of the objectives used to evaluate alternatives.

² CEQA Guidelines Section 15364 defines feasible as “capable of being accomplished within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors. CEQA Guidelines Section 15126.6(f)(1) states that “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability) economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site...”

a. Overarching Objectives of the TOD Plans

The overarching objectives and underlying purpose of the proposed TOD Plans for the Westchester/Veterans and Crenshaw/Imperial areas are to:

- Expand economic development opportunities and enhance revenue-generating activities that support the City's economy and the delivery of public services, and increase opportunities for employment and housing;
- Maximize utilization of the Metro Crenshaw/LAX Line Westchester/Veterans Station and the Metro Green Line Crenshaw Station through the creation of pedestrian-friendly and economically vibrant mixed-use settings and improved non-vehicular access to the stations;
- Assist in achieving citywide SB 32 greenhouse reduction targets; and
- Protect and enhance existing residential neighborhoods.

b. Additional Objectives of the TOD Plans

Additional objectives of the TOD Plans include:

- Providing a model for sustainable development and implementing the Inglewood Energy and Climate Action Plan;
- Developing multi-modal gateways to the City of Inglewood;
- Encouraging art and technology by providing appropriate settings for their development;
- Providing unique open space resources serving both nearby employees and residents of the City;
- Enhancing the Crenshaw/Imperial area as a complete neighborhood hub providing housing, shopping, education, and recreation for residents of all ages and households of all types; and
- Maintaining a safe, well-maintained, unified, and attractive community with a unique sense of place.

7.3 ANALYSIS OF ALTERNATIVES

In accordance with the general selection criteria discussed in Section 7.1, *Criteria for Selecting Alternatives*, above, the following alternatives were selected for analysis in this EIR. A comparison of the net increase in development for each alternative compared to the proposed TOD Plans is presented in Table 7-1.

1. **No Project.** The No Project Alternative assumes that the proposed TOD Plans are not adopted. Adaptive reuse of existing buildings would occur, as would a minimal amount of development on existing vacant and underutilized sites.
2. **Low Intensity Development (50 Percent Reduction).** Under this alternative, the proposed TOD Plans would be approved with an approximate 50 percent lower net increase in development.
3. **Reduced Intensity Transit Oriented Development (25 Percent Reduction).** Under this alternative, the proposed TOD Plans would be approved with an approximate 25 percent lower net increase in development.
4. **Higher Intensity Transit Oriented Development (25 Percent Increase).** Under this alternative, the proposed TOD Plans would be approved with an approximate 25 percent higher net increase in development.

TABLE 7-1: PROPOSED DEVELOPMENT

Alternative	Net Increase in Development		
	Residential (units)	Retail (s.f.)	Commercial/Office (s.f.)
1. No Project	400	25,000	300,000
2. Low Intensity Development	2,045	29,730	637,055
3. Reduced Intensity Development	3,067	44,595	955,585
4. Increased Intensity Development	5,110	74,325	1,592,640
Proposed TOD Plans	4,090	59,459	1,274,181

The following discussion evaluates and compares the impacts of each alternative considered by the Lead Agency with the impacts of the proposed Westchester/Veterans and Crenshaw/Imperial TOD Plans, as detailed in Chapter 3, *Environmental Setting, Impacts, and Mitigation*.

7.3.1 NO PROJECT ALTERNATIVE

a. Description of the No Project Alternative

The No Project Alternative assumes that the proposed TOD Plans are not adopted. None of the TOD Plan components described in Chapter 2, *Project Description*, would be approved or implemented, and there would be no further development within the TOD Plan areas other than existing development approvals, adaptive reuse of existing buildings, and a minimal amount of development on currently vacant sites pursuant to current General Plan and zoning requirements. The net increase in development under this alternative would be:

- Residential: 400 multi-family dwelling units
- Retail: 25,000 square feet
- Commercial/Office: 300,000 square feet

This alternative is intended to meet the requirements of CEQA Guidelines Section 15126.6(e) for evaluation of a no project alternative.

b. Impacts of the No Project Alternative**Land Use and Planning**

EIR Determination for Land Use and Planning (TOD Plans): No Impact

Because of its infill nature, this alternative would not result in impacts related to the division of existing communities. While the No Project Alternative would not be inconsistent with currently applicable local planning policies, it would forego substantial opportunities for transit-oriented development and would, therefore not assist in achieving regional goals related to concentrating future development in proximity to transit, nor would this alternative contribute to achieving reductions in air pollutant and GHG emissions by increasing use of transit and non-vehicular travel through high density, mixed-use development in strategic locations, such as adjacent to transit.

Population, Housing, Housing and Employment

EIR Determination for Population, Housing, and Employment (TOD Plans): Less than Significant

Resident population growth under the No Project Alternative would be approximately 1,100, which is about 10 percent of the population growth anticipated for the proposed TOD Plans, while employment growth would be approximately 2,616, which is about 46 percent of the employment growth anticipated for the proposed TOD Plans. Because population, housing and employment growth would be far below that of the proposed TOD Plan, which was determined in this EIR to be consistent with regional growth forecasts, population and employment growth associated with this alternative would also be consistent with regional growth forecasts. The No Project alternative would not generate sufficient housing to meet the City's fair share of regional housing need for the 6th Housing Element cycle, requiring the City to increase allowable development intensity to make up for a shortfall in citywide opportunities for housing development for all economic segments of the community.

As with development of the TOD Plan areas, the No Project Alternative also would generate temporary construction-related jobs, albeit fewer than for the proposed TOD Plan. It is expected that construction workers generally would travel from other parts of the Los Angeles area to work, and that temporary housing within the TOD Plan areas would not be needed.

Cultural Resources

EIR Determination for Cultural Resources (TOD Plans): Less than Significant

Development occurring under the No Project Alternative would have the potential for uncovering unknown buried resources as the result of site construction activities on infill sites. The likelihood of uncovering such resources would be far less than for the proposed TOD Plans, since there would be far fewer development sites where disturbance of the ground surface would occur. Impacts on designated historic resources would be avoided since adaptive reuse of historic structures under this alternative would be required to adhere to Secretary of Interior Standards.

Transportation

EIR Determination for Traffic and Circulation (TOD Plans): Less than Significant

While the No Project Alternative would generate 75-85 percent fewer vehicle trips that would the proposed TOD Plans, vehicle miles travelled (VMT) per service population would remain at current levels. Thus, the No Project Alternative would not realize the substantial reduction in VMT per service population that would be achieved by the TOD Plans.

Air Quality

EIR Determination for Air Quality (TOD Plans): Less than Significant

Impacts related to air pollutant emissions under the No Project Alternative would be substantially reduced compared to those that would occur as the result of development permitted by the TOD Plans due to a 75-85 percent reduction in the amount of development that would occur.

Greenhouse Gas Emissions

EIR Determination for Greenhouse Gas Emissions (TOD Plans): Less than Significant

While the total amount of greenhouse gas emissions resulting from the No Project Alternative would be substantially less than for the proposed TOD Plans, greenhouse gas emissions on a per service population basis would be greater. This is because the site-specific infill and adaptive reuse projects that would occur in this Alternative would not have the same degree of transit orientation as would development permitted by the proposed TOD Plans. This alternative also does not provide for improved access to the Crenshaw Metro Green Line station from areas to the north of the station. The No Project Alternative would not provide the extent of bicycle or pedestrian mobility enhancements, including access to Metro transit stations, as would the proposed TOD Plan. As a result, the degree of mode shift from automobiles to transit

and non-motorized travel that would be achieved by the TOD Plans would not be achieved under the No Project Alternative.

Energy Resources

EIR Determination for Energy Resources (TOD Plans): Less than Significant

While the total amount of energy use resulting from the No Project Alternative would be substantially less than for the proposed TOD Plans, energy use on a per service population basis would be greater. This is because the infill and adaptive reuse projects that would occur in the No Project Alternative would not have the same degree of transit orientation as would development permitted by the proposed TOD Plans. The No Project Alternative does not provide for improved access to the Crenshaw Metro Green Line station from areas to the north of the station. In addition, this alternative would not provide the extent of bicycle or pedestrian mobility enhancements, including access to Metro transit stations, as would the proposed TOD Plans. As a result, the degree of mode shift from automobiles to transit and non-motorized travel that would be achieved under the TOD Plans would not be achieved under this Alternative.

Noise and Vibration

EIR Determination for Noise and Vibration (TOD Plans): Less than Significant

Noise levels at site-specific development construction sites would be the same as for development permitted by the proposed TOD Plans. However, the 75-85 percent reduction in development under this Alternative as compared to the proposed TOD Plans would substantially reduce the number of active construction sites and the overall length of time it would take to build out the TOD Plan areas. In addition to reduced construction noise, the reduced amount of development that would occur under this alternative would generate less construction traffic. Increases in noise levels resulting from the No Project Alternative would be far less than for the proposed TOD Plans but would still result in increased noise along some roadways, even though most of these increases would not be perceptible to the human ear.

Hazards and Hazardous Materials

EIR Determination for Hazards and Hazardous Materials (TOD Plans): Less than Significant

The No Project Alternative would require site preparation activities, including excavation to a much lesser degree than would the TOD Plans and would eliminate nearly all demolition activities. The No Project Alternative would also substantially reduce the amount of new commercial and industrial use that could involve the storage and use of hazardous materials. Thus, this Alternative would result in far fewer risks of exposure to hazardous materials,

including potential asbestos and lead-based paint that could be released during demolition of existing buildings. Overall, impacts with regard to hazards and hazardous materials under this alternative would be substantially less than those described under the proposed TOD Plans.

Hydrology and Water Quality

EIR Determination for Hazards and Hazardous Materials (TOD Plans): Less than Significant

The No Project alternative would result in a similar, minimal change in impervious surface area as would the proposed TOD Plans. In addition, development under the No Project Alternative would meet the same regulatory requirements to detain stormwater onsite and minimize water quality impacts as would development permitted by the proposed TOD Plans. However, the No Project alternative would result in substantially fewer existing development sites being redeveloped. Thus, fewer sites within the TOD Plan areas would be required to detain onsite stormwater runoff such that there would be no net increase in peak runoff, and fewer sites would be required to provide onsite systems for handling runoff from roofs and parking areas. The net result would be that although drainage systems would be adequate to handle runoff generated by the No Project alternative, the overall amount of stormwater runoff and urban pollutants carried in that runoff would be greater for the No Project Alternative than for the proposed TOD Plans.

Geology, Soils, and Seismicity

EIR Determination for Geology, Soils, and Seismicity (TOD Plans): Less than Significant

Because it would involve far less development than the proposed TOD Plans, the No Project Alternative would place far fewer people within a seismically active region. Development permitted by the No Project Alternative would be required to comply with the same California Building Code requirements as would development permitted by the proposed TOD Plans.

Public Services

EIR Determination for Public Services (TOD Plans): Less than Significant

Similar to the proposed TOD Plans, additional population and employment resulting from the No Project Alternative would increase demand for fire protection services, police services, public schools, library services, and parks and recreation. However, no new public facilities would be required to be expanded or constructed and the No Project Alternative would be no physical environmental impacts associated with the provision of public services.

Utilities, Service Systems, and Water Supply

EIR Determination for Utilities, Service Systems, and Water Supply (TOD Plans): Less than Significant

Population and employment increases resulting from the No Project Alternative would increase existing water consumption, wastewater generation, and solid waste generation. However, because the No Project alternative would generate a far smaller increase in population and employment than the proposed TOD Plans, impacts would be substantially reduced from the less than significant impacts of the TOD Plans.

Recreational Resources

EIR Determination for Recreational Resources (TOD Plans): Less than Significant

However, because the No Project alternative would generate a far smaller increase in population and employment than the proposed TOD Plans, the increase in demand for parks and recreational facilities would be substantially reduced from the proposed TOD Plans. However, while site-specific development projects permitted under the No Project Alternative would pay City in lieu park fees, such development would not provide the parks, plazas, bicycle lanes, and other recreational amenities that would be provided by the proposed TOD Plans.

7.3.2 REDUCED INTENSITY TRANSIT ORIENTED DEVELOPMENT ALTERNATIVE

a. Description of the Reduced Intensity TOD Alternative

The Reduced Intensity TOD Alternative is intended to reduce the net increase of development within the Westchester/Veterans and Crenshaw/Imperial areas as a means of reducing the physical impacts of the TOD Plans. Under this alternative, the proposed TOD Plans would be approved with a 25 percent reduction in the net development increase. Future development permitted by the Reduced Intensity TOD Alternative would largely consist of existing development approvals, adaptive reuse of existing buildings, and development on currently vacant and underutilized sites.

The net increase in development under the Reduced Intensity TOD Alternative would be:

- Residential: 3,067 multi-family dwelling units
- Commercial: 529,475 square feet

b. Impacts of the Reduced Intensity TOD Alternative

Land Use and Planning

EIR Determination for Land Use and Planning (TOD Plans): Less than Significant

The Reduced Intensity TOD Alternative would involve an amendment to the General Plan redesignating the TOD Plan Areas as Westchester/Veterans and Crenshaw/Imperial TOD, respectively. Because the Reduced Intensity TOD Alternative retains the land use pattern of the proposed TOD Plans at a reduced intensity, it would also not result in impacts related to the division of existing communities.

While the Reduced Intensity TOD Alternative would be consistent with applicable planning policies, it would substantially reduce opportunities for transit-oriented development and would, therefore, not assist in achieving regional goals related to concentrating future development in proximity to transit to the same degree as would the proposed TOD Plans. As a result, this alternative contributes to a lesser degree than the TOD Plans to achieving reductions in air pollutant and GHG emissions as well as reduction in vehicle miles traveled through use of transit and non-vehicular travel because it provides less high density, mixed-use development in strategic locations, such as adjacent to transit.

Population, Housing, Housing and Employment

EIR Determination for Population, Housing, and Employment (TOD Plans): Less than Significant

Resident population growth under the Reduced Intensity TOD Alternative would be approximately 8,465, while employment growth would be approximately 4,265, both of which are about 75 percent of the net growth that would result from the proposed TOD Plans. Because population, housing and employment growth would be below that of the proposed TOD Plans, which were determined in this EIR to be consistent with regional growth forecasts, population and employment growth associated with this Alternative would also be consistent with regional growth forecasts.

As with development of the TOD Plans, the Reduced Intensity TOD Alternative would generate temporary construction-related jobs, albeit fewer than for the proposed TOD Plans. It is expected that construction workers generally would travel from other parts of the Los Angeles area to work, and that temporary housing within the TOD Plan areas would not be needed.

Cultural Resources

EIR Determination for Cultural Resources (TOD Plans): Less than Significant

The Reduced Intensity TOD Alternative has the same potential for uncovering unknown buried resources during site-specific development on infill sites as do the TOD Plans. This is because there would be the same number of development sites where disturbance of the ground surface would occur. Impacts on designated historic resources would be avoided as adaptive reuse of historic structures under the Reduced Intensity TOD Alternative would be required to adhere to Secretary of Interior Standards.

Transportation

EIR Determination for Traffic and Circulation (TOD Plans): Less than Significant

A 25 percent reduction in net new development compared to the proposed TOD Plans would reduce average daily vehicle trip generation. This alternative would also provide for improved access to the Crenshaw Metro Green Line station from areas to the north of the station. In addition, the Reduced Intensity TOD Alternative would provide the same extent of bicycle or pedestrian mobility enhancements, including access to Metro transit stations, as would the proposed TOD Plans. As a result, the degree of mode shift from automobiles to transit and non-motorized travel that would be achieved under the TOD Plans would be only slightly less under this Alternative than the proposed TOD Plans since proportionately less development would be adjacent to Metro stations.

While VMT per service population for new development would be the same as for the TOD Plans, the Reduced Intensity TOD Alternative would not reduce VMT for the TOD Plan areas as a whole to the same degree as would the TOD Plans.

Air Quality

EIR Determination for Air Quality (TOD Plans): Less than Significant

Because the net increase in development permitted by the Reduced Intensity TOD Alternative would be 25 percent less than for the TOD Plans, operational emissions from stationary and mobile sources would be reduced proportionately. Construction emissions would also be reduced in comparison to the proposed TOD Plans; however, since the Reduced Intensity TOD Alternative would involve the same number of site-specific development projects, construction emissions would be reduced although not reduced to the same degree as operational emissions.

Greenhouse Gas Emissions

EIR Determination for Greenhouse Gas Emissions (TOD Plans): Less than Significant

Because the net increase in development permitted by the Reduced Intensity TOD Alternative would be 25 percent less than for the TOD Plans, operational emissions of GHGs from stationary and mobile sources would be reduced proportionately.

Because the significance of greenhouse gas emissions is based on a per service population metric, the Reduced Intensity TOD Alternative would result in slightly higher per service population GHG emissions for the overall TOD Plan areas at buildout than would the proposed TOD Plans even though total emissions would be reduced. This is because the site-specific infill and adaptive reuse projects that would occur in this Alternative adjacent to the Metro Stations would have a reduced intensity as compared to the proposed TOD Plans.

Energy Resources

EIR Determination for Energy Resources (TOD Plans): Less than Significant

While the total amount of energy use resulting from the Reduced Intensity TOD Alternative would be less than for the proposed TOD Plans, energy use on a per service population basis would be slightly greater because:

- The proportion of development constructed to CalGreen standards compared to older, less energy efficient building code requirements would be greater for the TOD Plans than for the Reduced Intensity TOD Alternative;
- The intensity of development adjacent to Metro stations would be lower for this Alternative than it would be for the proposed TOD Plans thereby resulting in a lesser mode shift to transit than would be achieved by the proposed TOD Plans.

The Reduced Intensity TOD Alternative would provide similar access to the Crenshaw Metro Green Line station from areas to the north of the station as would the proposed Crenshaw/Imperial TOD Plan and would also provide the same extent of bicycle and pedestrian mobility enhancements, including access to Metro transit stations, as would the proposed TOD Plans.

Noise and Vibration

EIR Determination for Noise and Vibration (TOD Plans): Less than Significant

Noise levels at site-specific construction sites for development permitted by the Reduced Intensity TOD Alternative would be the same as for the proposed TOD Plans. In addition, the Reduced Intensity TOD Alternative would result in the same number of such construction sites as would the proposed TOD Plans. However, due to the reduced amount of development that

would occur under the Reduced Intensity TOD Alternative, the length of time that construction activities might occur at any given construction site would be reduced compared to the proposed TOD Plans. Increases in noise levels resulting from the Reduced Intensity TOD Alternative would be similar to the less than significant impacts of the proposed TOD Plans for the maximum construction day.

Hazards and Hazardous Materials

EIR Determination for Hazards and Hazardous Materials (TOD Plans): Less than Significant

The Reduced Intensity TOD Alternative would require site preparation activities, including excavation to the same degree as would the TOD Plans because the number of individual construction sites would remain the same. This Alternative would reduce the amount of new commercial and industrial use that could involve the storage and use of hazardous materials compared to the proposed TOD Plans. Thus, the Reduced Intensity TOD Alternative would result in fewer risks of exposure to hazardous materials from ongoing operations. Overall, impacts with regard to hazards and hazardous materials under this Alternative would be less than those that would occur for the proposed TOD Plans.

Hydrology and Water Quality

EIR Determination for Hazards and Hazardous Materials (TOD Plans): Less than Significant

Development that would be permitted by the Reduced Intensity TOD Alternative would result in a similar increase in impervious surface area as the proposed TOD Plans. In addition, the Reduced Intensity TOD Alternative would meet the same regulatory requirements to detain stormwater onsite and minimize water quality impacts as development under the proposed TOD Plans, resulting in similar amounts of stormwater runoff and urban pollutants.

Geology, Soils, and Seismicity

EIR Determination for Geology, Soils, and Seismicity (TOD Plans): Less than Significant

Because it would involve less net new development than the proposed TOD Plans, the Reduced Intensity TOD Alternative would place fewer people within a seismically active region. The development that would be permitted by the Reduced Intensity TOD Alternative would be required to comply with all California Building Code requirements, as would development under the proposed TOD Plans, resulting in similar impacts.

Public Services and Facilities

EIR Determination for Public Services (TOD Plans): Less than Significant

Similar to the proposed TOD Plans, additional population and employment resulting from the Reduced Intensity TOD Alternative would increase demand for fire protection services, police services, public schools, library services, and parks and recreation. However, no new public facilities would be required to be expanded or constructed and the Reduced Intensity TOD Alternative would be no physical environmental impacts associated with the provision of public services.

Utilities, Service Systems, and Water Supply

EIR Determination for Utilities, Service Systems, and Water Supply (TOD Plans): Less than Significant

Population and employment increases resulting from the Reduced Intensity TOD Alternative would increase existing water consumption, wastewater generation, and solid waste generation. However, because the Reduced Intensity TOD Alternative would result in a smaller population and employment increase than would the proposed TOD Plans, impacts would be reduced compared to the proposed TOD Plans.

Recreational Resources

EIR Determination for Recreational Resources (TOD Plans): Less than Significant

The reduced residential population that would result from the Reduced Intensity TOD Alternative would increase demand for parks and recreational facilities to a lesser degree than the proposed TOD Plans. The Reduced Intensity TOD Alternative would provide the same bicycle lanes as would the proposed TOD Plans but would provide a proportionately lesser amount of park and plaza area as compared to the TOD Plans.

7.3.3 LOW INTENSITY DEVELOPMENT ALTERNATIVE

a. Description of the Low Intensity Development Alternative

The Low Intensity Development Alternative would substantially reduce the net increase of development within the Westchester/Veterans and Crenshaw/Imperial. Under this Alternative, the proposed TOD Plans would be approved with approximately half of the net increase in development within the Westchester/Veterans and Crenshaw/Imperial areas compared to the proposed TOD Plans. The net increase in development under the Low Intensity Development Alternative would be:

- Residential: 2,045 multi-family dwelling units
- Commercial: 352,980 square feet

b. Impacts of the Low Intensity Development Alternative**Land Use and Planning**

EIR Determination for Land Use and Planning (TOD Plans): No Impact

The Low Intensity Development Alternative would involve an amendment to the General Plan re-designating the TOD Plan areas as Westchester/Veterans TOD and Crenshaw/Imperial TOD. Because the Low Intensity Development Alternative retains the land use pattern of the proposed TOD Plans at a lower intensity, it would also not result in impacts related to the division of existing communities.

While the Low Intensity Development Alternative would be consistent with applicable planning policies, it would largely forego opportunities for transit-oriented development and would, therefore provide minimal assistance in achieving regional goals related to concentrating future development in proximity to transit. As a result, this alternative would contribute to a substantially lesser degree than the TOD Plans in achieving reductions in air pollutant and GHG emissions as well as reductions in VMT through use of transit and non-vehicular travel because it provides far less high density, mixed-use development in strategic locations adjacent to transit.

Population, Housing, Housing and Employment

EIR Determination for Population, Housing, and Employment (TOD Plans): Less than Significant

Resident population growth under the Low Intensity Development Alternative would be approximately 5,645, while employment growth would be approximately 2,842, both of which are about 50 percent of the growth anticipated for the proposed TOD Plans, which would be consistent with regional growth forecasts.

As with development of the TOD Plans, this alternative also would generate temporary construction-related jobs, albeit fewer than for the proposed TOD Plans. It is expected that construction workers generally would travel from other parts of the Los Angeles area to work, and that temporary housing within the TOD Plan areas would not be needed.

Cultural Resources

EIR Determination for Cultural Resources (TOD Plans): Less than Significant

The Low Intensity Development Alternative would have the same potential for uncovering previously unknown buried resources as the result of future development on infill sites, since there would be the same number of development sites where disturbance of the ground surface would occur. Impacts on designated historic resources would be avoided as adaptive reuse of historic structures under this alternative would be required to adhere to Secretary of Interior Standards.

Traffic and Circulation

EIR Determination for Traffic and Circulation (TOD Plans): Less than Significant

The 50 percent reduction in net development increase that would occur with the Low Intensity Development Alternative compared to the proposed TOD Plans would reduce average daily vehicle trip generation.

A 50 percent reduction in net new development compared to the proposed TOD Plans would reduce average daily vehicle trip generation. This alternative would also provide for improved access to the Crenshaw Metro Green Line station from areas to the north of the station. In addition, the Reduced Intensity Alternative would provide the bicycle and pedestrian mobility enhancements, including access to Metro transit stations, as would the proposed TOD Plans albeit to a lesser degree than would the TOD Plans. As a result, the mode shift from automobiles to transit and non-motorized travel that would be achieved would be less for this Alternative than the proposed TOD Plans since proportionately less development would be adjacent to Metro stations.

While VMT per service population for new development would be the same as for the TOD Plans, the Reduced Intensity TOD Alternative would not reduce VMT for the TOD Plan areas as a whole to the same degree as would the TOD Plans.

Air Quality

EIR Determination for Air Quality (TOD Plans): Less than Significant

Because the net increase in development permitted by the Low Intensity Development Alternative would be 50 percent less than for the TOD Plans, operational emissions from stationary and mobile sources would be reduced proportionately. Construction emissions would also be reduced in comparison to the proposed TOD Plans; however, since the Reduced Intensity Alternative would involve the same number of site-specific development projects,

construction emissions would be reduced although not reduced to the same degree as operational emissions.

Greenhouse Gas Emissions

EIR Determination for Greenhouse Gas Emissions (TOD Plans): Less than Significant

Because the net increase in development permitted by the Low Intensity Development Alternative would be 50 percent less than for the TOD Plans, emissions of GHGs from stationary and mobile sources would be reduced proportionately.

Because the significance of greenhouse gas emissions is based on a per service population efficiency metric, the Low Intensity Development Alternative would result in slightly higher per capita GHG impacts than would the proposed TOD Plans even though total emissions would be reduced. This is because the site-specific infill and adaptive reuse projects that would occur in this Alternative adjacent to the Metro Stations would have a reduced intensity as compared to the proposed TOD Plans.

This alternative would also provide for improved access to the Crenshaw Metro Green Line station from areas to the north of the station. In addition, the Reduced Intensity TOD Alternative would provide bicycle or pedestrian mobility enhancements, including access to Metro transit stations to a lesser degree than would the proposed TOD Plans. As a result, this Alternative would achieve a lesser degree of mode shift from automobiles to transit and non-motorized travel than would be achieved by the TOD Plans.

Energy Resources

EIR Determination for Energy Resources (TOD Plans): Less than Significant

While the total amount of energy use resulting from the Reduced Intensity Alternative would be less than for the proposed TOD Plans, energy use on a per service population basis would be greater because:

- The proportion of development constructed to CalGreen standards compared to older, less energy efficient building code requirements would be greater for the TOD Plans than for the Reduced Intensity TOD Alternative;
- The intensity of development adjacent to Metro stations would be lower for this Alternative than it would be for the proposed TOD Plans thereby resulting in a lesser mode shift to transit than would be achieved by the proposed TOD Plans.

The Reduced Intensity Alternative would provide similar access to the Crenshaw Metro Green Line station from areas to the north of the station as would the proposed Crenshaw/Imperial

TOD Plan and would also provide bicycle and pedestrian mobility enhancements, including access to Metro transit stations, albeit to a lesser degree would the proposed TOD Plans.

Noise and Vibration

EIR Determination for Noise and Vibration (TOD Plans): Less than Significant

Noise levels at site-specific construction sites for development permitted by the Low Intensity Development Alternative would be the same as for the proposed TOD Plans. In addition, the Reduced Intensity Alternative would result in the same number of such construction sites as would the proposed TOD Plans. However, due to the reduced amount of development that would occur under the Low Intensity Development Alternative, the length of time that construction activities might occur at any given construction site would be reduced compared to the proposed TOD Plans. Increases in noise levels resulting from the Low Intensity Development Alternative would be similar to the less than significant impacts of the proposed TOD Plans for the maximum construction day.

Hazards and Hazardous Materials

EIR Determination for Hazards and Hazardous Materials (TOD Plans): Less than Significant

The Low Intensity Development Alternative would require site preparation activities, including excavation to the same degree as would the TOD Plans. The Low Intensity Development Alternative would also reduce the amount of new commercial and industrial use that could involve the storage and use of hazardous materials. Thus, this Alternative would result in fewer risks of exposure to hazardous materials from ongoing operations. Overall, impacts with regard to hazards and hazardous materials under this alternative would be less than those described under the proposed TOD Plans.

Hydrology and Water Quality

EIR Determination for Hazards and Hazardous Materials (TOD Plans): Less than Significant

Development within the TOD Plan areas permitted by the Low Intensity Development Alternative would result in a similar increase in impervious surface area as the proposed TOD Plans. In addition, development permitted by the Low Intensity Development Alternative would meet the same regulatory requirements to detain stormwater onsite and minimize water quality impacts as development under the proposed TOD Plans, resulting in similar amounts of stormwater runoff and urban pollutants.

Geology, Soils, and Seismicity

EIR Determination for Geology, Soils, and Seismicity (TOD Plans): Less than Significant

Because it would involve less development than the proposed TOD Plans, the Low Intensity Development Alternative would place fewer people in a seismically active region. Development permitted by this Alternative would be required to comply with all California Building Code requirements, as would development under the proposed TOD Plans, resulting in similar impacts.

Public Services

EIR Determination for Public Services (TOD Plans): Less than Significant

Similar to the proposed TOD Plans, additional population and employment resulting from the Low Intensity Development Alternative would increase demand for fire protection services, police services, public schools, library services, and parks and recreation. However, no new public facilities would be required to be expanded or constructed and the Low Intensity Development Alternative would be no physical environmental impacts associated with the provision of public services.

Utilities, Service Systems, and Water Supply

EIR Determination for Utilities, Service Systems, and Water Supply (TOD Plans): Less than Significant

Population and employment increases resulting from the Low Intensity Development Alternative would increase existing water consumption, wastewater generation, and solid waste generation. However, because the population and employment increase resulting from the Low Intensity Development Alternative would be less than that of the proposed TOD Plans, impacts would be substantially reduced from those of the TOD Plans.

Recreational Resources

EIR Determination for Recreational Resources (TOD Plans): Less than Significant

The reduced residential population that would result from the Low Intensity Development Alternative would increase demand for parks and recreational facilities to a lesser degree than the proposed TOD Plans. This Alternative would provide the same bicycle lanes as would the proposed TOD Plan but would provide a proportionately lesser amount of plaza area as compared to the TOD Plans. Impacts of the Low Intensity Development Alternative in relation to recreational resources would therefore be similar to those of the TOD Plans.

7.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires that an EIR identify an environmentally superior alternative. If the No Project Alternative is identified as the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives (CEQA Guidelines Section 15126.6(e)(2)). In the case of the TOD Plans, the No Project Alternative, would be environmentally superior since it reduces or avoids the significant traffic effects of the TOD Plans and reduces nearly all other environmental effects.

Of the other alternatives evaluated in this EIR, the Low Intensity Development Alternative would be the environmentally superior alternative since it involves minimal impacts compared to the proposed TOD Plans and meets most objectives albeit not to the same degree as do the proposed TOD Plans.

CHAPTER 8 EIR PREPARERS

This Draft Program Environmental Impact Report (EIR) document was prepared by the City of Inglewood with assistance from a consulting team of environmental planners, engineers, and scientists.

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