# APPENDIX Q

# Environmental Justice Technical Report

# INGLEWOOD TRANSIT CONNECTOR

# Environmental Justice Technical Report

**Prepared for:**
**CITY OF INGLEWOOD**
One West Manchester Boulevard
Inglewood, California 90301

**Prepared by:**
**TERRY A. HAYES ASSOCIATES INC.**
3535 Hayden Avenue, Suite 350
Culver City, CA 90232

January 2022

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# ACRONYMS

| | |
|---|---|
| ADA | American Disability Act |
| ADT | Average daily trips |
| ACS | American Community Survey |
| APEFZ | Alquist-Priolo Earthquake Fault Zones |
| ATS | Automated Transit System |
| AVE | Area of visual effect |
| Caltrans | California Department of Transportation |
| CCP | Construction Commitment Program |
| CDP | Census-Designated Place |
| CEQ | Council of Environmental Quality |
| CO | Carbon Monoxide |
| DBFOM | design-build-finance-operate-maintenance |
| EJ | Environmental Justice |
| EPA | Environmental Protection Agency |
| FTA | Federal Transit Administration |
| FTIP | Federal Transportation Improvement Program |
| GHG | Greenhouse Gas Emissions |
| HHS | United States Human and Health Services |
| HUD | United States Housing and Urban Development |
| IPD | Inglewood Police Department |
| ITC | Inglewood Transit Connector |
| IUSD | Inglewood Unified School District |
| kBTU | thousand British Thermal Units |
| LACFD | Los Angeles County Fire Department |
| LASED | Los Angeles Stadium and Entertainment District |
| LAX | Los Angeles International Airport |
| LEP | Limited English Proficient |
| LRTP | Long Range Transportation Plan |
| LUST | Leaking underground storage tanks |
| Metro | Los Angeles County Metropolitan Transportation Authority |
| mph | Miles per Hour |
| MSAT | Mobile Source Air Toxic |
| MSF | Maintenance and Storage Facility |
| MTCO2e | Metric tons of carbon dioxide equivalent |
| NAAQS | National Ambient Air Quality Standards |
| NEPA | National Environmental Policy Act |
| PDS | Power Distribution System |
| PM | Particulate Matter |
| RTP | Regional Transportation Plan |
| SCAG | Southern California Association of Governments |
| SCAQMD | South Coast Air Quality Management District |
| SCE | Southern California Edison |
| SCS | Sustainable Communities Strategy |
| USDOT | United States Department of Transportation |
| UST | underground storage tanks |

| | |
|---|---|
| VMT | vehicle miles travel |
| VOC | volatile organic compound |

# 1.0 INTRODUCTION

The City of Inglewood (City) proposes the Inglewood Transit Connector Project (ITC or proposed Project) to improve overall mobility and levels of service, address projected future congestion, provide access to transit to its priority populations, and advance its sustainability goals.

## 1.1 BACKGROUND

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires federal agencies to achieve environmental justice (EJ) by "identifying and addressing the social and economic effects of their programs, policies, and activities on minority populations and low-income populations in the United States." As a response to Executive Order 12898, the United States Department of Transportation (USDOT) issued an Order to Address Environmental Justice in Minority Populations and Low-Income Populations. This order sets guidelines to ensure that federally-funded transportation-related programs, policies, or activities that have the potential to adversely affect human health or the environment involve a planning and programming process that considers the effects on minority populations and low-income populations. This report identifies and addresses, as appropriate, disproportionately high and adverse human health or environmental effects on EJ populations.

## 1.2 PURPOSE OF STUDY

For purposes of this technical report, the following analysis uses the Federal Transit Administration (FTA) Circular FTA C4703.1 as guidance to incorporate environmental justice principles into the proposed Project. The report is organized into ten sections:

Section 1 – Introduction
Section 2 – Description of Alternatives
Section 3 – Regulatory Framework
Section 4 – Methodology
Section 5 – Affected Environment
Section 6 – Environmental Consequences
Section 7 – Construction Effects
Section 8 – Measures to Minimize Harm
Section 9 – List of Preparers
Section 10 – References

# 2.0 DESCRIPTION OF ALTERNATIVES

The EJ technical report assesses two alternatives, which are the No Build Alternative and the Build Alternative (proposed Project). Environmental review under the National Environmental Policy Act (NEPA) must consider the effects of not implementing the proposed Project. The No Build Alternative provides a basis for comparing the Build Alternative and is used as the baseline for comparing environmental effects.

## 2.1 NO BUILD ALTERNATIVE

The No Build Alternative provides the background transportation network, against which the Build Alternatives' impacts are identified and evaluated under NEPA. The No Build Alternative does not include the proposed Project. Specifically, the No Build Alternative reflects the reasonably foreseeable transportation network in 2027 and 2045 and includes the existing transportation network and planned transportation improvements that have been committed to and identified in the constrained Los Angeles County Metropolitan Transportation Authority (Metro) Long Range Transportation Plan and the Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, as well as additional projects funded by Measure M, a sales tax initiative in Los Angeles County approved by voters in November 2016.

The No Build Alternative includes Transportation Management and Operations Plan developed by the City in 2020 to address future traffic demands that may result from events at SoFi Stadium. The Inglewood Stadium Events Transportation Management and Operations Plan establishes a plan that provides public information, reduces unwarranted traffic through adjacent neighborhoods, and promotes the use of alternative modes of transportation. To address the limited pre-sold on-site parking available at SoFi Stadium, the City has established a remote parking and shuttle program that considers comprehensive access, circulation and traffic management for residents, visitors, and businesses on National Football League game days and during large special events. Given the growing event-day demand of the program, the City would still have a need for additional real property to supplement continuation of its current transportation demand management programs. For example, the City has established a remote parking and shuttle program known as IPark&Go that promotes the easy, efficient use of high occupancy shuttles by event attendees traveling to SoFi Stadium. Also, the City has established transit partnerships and received support from Metro, Big Blue Bus (Santa Monica), GTrans (Gardena), and Torrance Transit to expand transit service to its major entertainment, employment, and residential centers in the Hollywood Park area. Under the No Build alternative, the City would work to promote and expand use of IPark&Go and would continue to work cooperatively with Metro and other municipal bus operators to increase and enhance transit service to City of Inglewood destinations through more frequent headways, additional route options, and other improvements. With respect to special events occurring at SoFi Stadium, Hollywood Park, The Forum, all of these high occupancy transportation modes currently conduct drop-off and pick-up at the City's Intermodal Transit Facility lot, located within the Hollywood Park redevelopment area. Because the Intermodal Transit Facility is already at or near full capacity on event days with the current shuttle and bus volume, the City would look to devote any additional, nearby City-owned real estate to the same transit purposes (including the vacant lot at the southwest corner of Prairie Avenue and Manchester Boulevard, should it be acquired). This additional space would facilitate the City's enhancement of existing traffic demand management programs under the No Build Alternative.

## 2.2 BUILD ALTERNATIVE

The proposed Project would include an approximately 1.6-mile long elevated, guideway primarily located within the public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue (**Figure 2-1**).

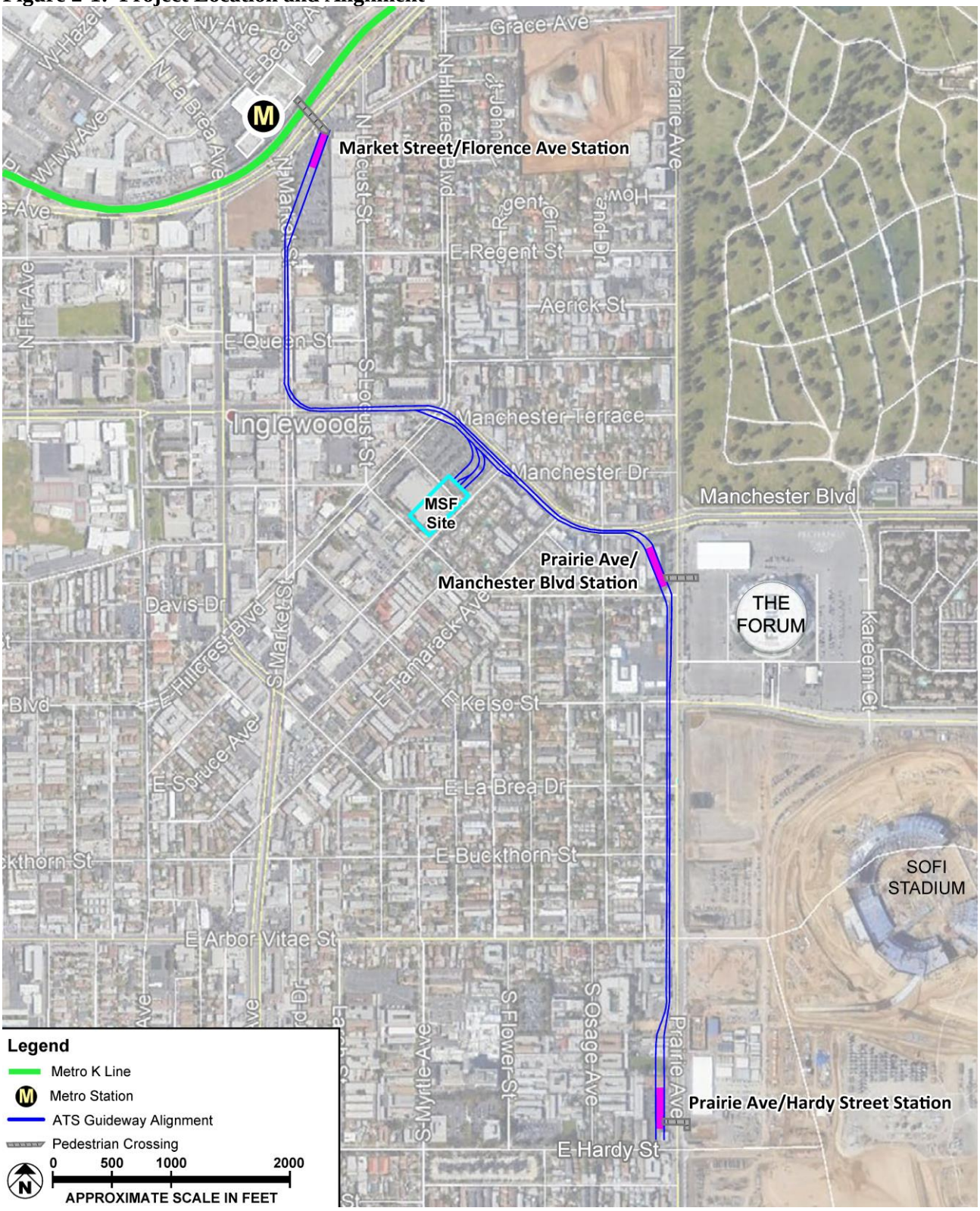
The alignment runs south for approximately 0.35 miles on Market Street, turning east at Manchester Boulevard for another 0.50 miles until turning south on Prairie Avenue. The alignment continues south on Prairie Avenue for approximately 0.75 miles ending north of Century Boulevard at Hardy Street. Three stations are proposed adjacent to the public right of way on privately-owned land that would be acquired as part of the proposed Project. Components of the proposed Project are summarized in **Table 2-1**.

The Conceptual Plans identify the proposed alignment for the Automated Transit System (ATS), which will be in the public right-of-way, with some supporting facilities and stations on private property located adjacent to the public right-of-way as described further in this section. These Conceptual Plans will likely be refined as design of the proposed Project progresses. The location, layout, and size of the proposed stations, traction power substations, and maintenance and storage facility as illustrated in the Conceptual Plans also represent the likely maximum potential size of these facilities for the purpose of analyzing the potential impacts. Engineering and design-level details of the proposed Project will be refined as it moves through the environmental review, approval, procurement, and design phases.

**Operating Characteristics**. The transit technology would be fully automated (i.e., driverless), which is necessary to operate at the tight headways to meet the projected ridership needs. Automated vehicles are smaller than traditional heavy rail technology so as to successfully maneuver the tight radius curves driven by the site-specific conditions. This type of technology is often times also referred to as automated guideway transit, automated people movers or simply monorails; regardless of the terminology used, it is a form of a light rail technology. The City is considering four transit technologies for the proposed Project. They include:

- **Self-Propelled Rubber-Tire ATS**: These systems are in widespread use at airports around the world, as well as in urban areas. They feature one-car to nine-car trains operating in a shuttle or pinched loop configuration.
- **Monorail***:* Monorails are in widespread use in urban environments around the world, as well as some systems at airports. The unique feature of monorails is that they are either supported by or suspended from a single beam, which generally provides a minimized visual impact. Monorails feature connected vehicles operating in a shuttle or pinched loop configuration.
- **Automated Light Rail Transit**: Large steel-wheel ATS systems operate in numerous urban settings and airport applications. These systems feature two-car to six-car trains operating in a shuttle or pinched loop configuration.
- **Cable-Propelled ATS**: Cable-propelled ATS systems operate in numerous urban settings and airport applications. The unique feature of a cable-propelled system is that the vehicles do not have onboard propulsion motors. Instead, they are propelled by a cable. These systems feature two-car to eight-car trains operating in a shuttle or pinched loop configuration.

**Figure 2-1: Project Location and Alignment**



The operating system for the proposed Project consists of various integrated subsystems including the ATS train vehicles, automated train control, power distribution, guidance, propulsion, communications systems, and other equipment to create a fully functional, automated, and driverless system. In addition, the proposed Project would include equipment to guide the movement of trains between stations, emergency lighting, communications and wayfinding systems, a command and control system, a public information system, and security systems to monitor activity at station platforms, along the guideway, and at the maintenance and storage facility (MSF).

**Transit Stations**. The proposed Project includes three center-platform stations located at Market Street/Florence Avenue, Prairie Avenue/Manchester Boulevard, and Prairie Avenue/Hardy Street. The Market Street/Florence Avenue Station would provide connections to the Metro K Line and Downtown Inglewood. The Prairie Avenue/Manchester Boulevard Station would provide a connection to the Forum, local businesses and residents, and the Los Angeles Stadium and Entertainment District (LASED), including SoFi Stadium. The Prairie Avenue/Hardy Street Station would provide connections to the LASED including the SoFi Stadium, the commercial uses at Hollywood Park, well as existing and future local businesses and residences, and the Inglewood Basketball and Entertainment Center, including the Intuit Dome. Regardless of the transit technology, each station would have three levels including the ground, mezzanine, and platform levels. The mezzanine level would provide connections for passengers received from connecting pedestrian bridges to avoid at-grade passenger roadway crossings. The Market Street/Florence Avenue Station would include an elevated pedestrian bridge connecting to the Metro K Line Downtown Inglewood Station. The Prairie Avenue/Manchester Boulevard Station would include an elevated pedestrian bridge connecting to the Forum property, and the Prairie Avenue/Hardy Street Station would include an elevated pedestrian bridge connecting to the LASED properties on the east side of Prairie Avenue. Each station will include vertical transportation elements (stairs, escalators, and elevators) between levels to accommodate circulation needs and code compliance for safe egress. Design of the vertical circulation components would also accommodate mobility requirements of passengers (strollers, walkers, wheelchairs) and mobility concerns, and all requirements of the Americans with Disabilities Act.

**Power Distribution System (PDS)**. Propulsion power which includes the power to run the train on the guideway and power for auxiliary and housekeeping needs would be provided by two PDS substations located along the alignment. Regardless of the transit technology, the two PDS substations would be located at the MSF and Prairie Avenue/Hardy Street Station sites. Each PDS substation is approximately 3,000 square feet (approximately 30 feet by 100 feet) with 20 feet of clearance above the finished floor.

**Maintenance and Storage Facility (MSF)**. The MSF would be used for regular, and corrective maintenance of the ATS trains and operating equipment, and for storage of the vehicle fleet. It is anticipated that the MSF would be similar regardless of the transit technology. The MSF is proposed on the eastern portion of the block bounded by Manchester Boulevard, Hillcrest Boulevard, Nutwood Street, and Spruce Avenue. The MSF would be elevated from ground level, with double-height clearance over the maintenance tracks, and a largely unenclosed ground floor. The maintenance level for ATS train cars would be located on the second floor to match the guideway track elevation. Employee and visitor employee access to the MSF would be provided via controlled gates. Security measures would include secured perimeter fencing, automated gates, electronic security card systems, intercoms, security cameras, and exterior lighting. This site is currently developed with commercial buildings containing a Vons grocery store, a private fitness gym, and gas station. The existing commercial building and gas station would be demolished and the Vons would be rebuilt. A PDS substation is proposed within this site, likely below the MSF or spur tracks.

| TABLE 2-1: ITC PROJECT COMPONENT LOCATIONS AND SIZES (CONCEPTUAL) | | |
|---|---|---|
| **Project Component** | **General Location** | **Approximate Size** |
| Guideway | • Located predominantly within the existing public right-of-way of Market St., Manchester Blvd., and Prairie Ave. | • Approximately 1.6 miles dual lane<br>• The guideway will vary in height from a minimum of ~35 feet to a maximum of ~60 feet measured from existing grade to top of guideway deck<br>• The dual-lane guideway width will vary from a minimum of ~30 feet to a maximum of ~75 feet. Maximum widths are at stations and approaches to stations. |
| Market Street/Florence Avenue Station | • Located on private property (to be acquired by the City) at the southeast corner of Market St./Florence Ave. | • Up to ~80 feet in height measured from existing grade to top of station canopy<br>• ~75 feet wide (station structure and guideway only; not including vertical circulation)<br>• ~200-foot long platform for train berthing |
| Prairie Avenue/Manchester Boulevard Station | • Located on private property (to be acquired by the City) at the southwest corner of Prairie Ave./Manchester Blvd. | • Up to ~80 feet in height measured from existing grade to top of station canopy<br>• ~75 feet wide (station structure and guideway only; not including vertical circulation)<br>• ~200-foot long platform for train berthing |
| Prairie Avenue/Hardy Street Station | • Located on private property (to be acquired by the City) at the northwest corner of Prairie Ave./Hardy St. | • Up to ~80 feet in height measured from existing grade to top of station canopy<br>• ~75-foot wide (station structure and guideway only, not including vertical circulation)<br>• ~200-foot long platform for train berthing |
| Vertical Circulation Elements | • Located at each station within the public right-of-way, easements, or private property to be acquired<br>• Locations will depend on station specific requirements to connect to existing sidewalk/passenger walkways. | • Vertical circulation elements will exist at each station to provide access from the platform level to the mezzanine level and ground level |
| Pedestrian Bridges | • Location 1: above Florence Ave. connecting the Market St./Florence Ave. Station to the Metro K) Line Downtown Inglewood Station. The landing on the Metro property will require an easement.<br>• Location 2: above Prairie Ave from Prairie/Manchester Station to the Forum site. The landing on the Forum property will require an easement.<br>• Location 3: above Prairie Ave from Prairie/Hardy Station to the Hollywood Park site, The landing on the Hollywood Park property will require an easement. | • Height will be up to ~65 feet measured from existing grade to top of structure<br>• ~30 feet wide maximum for passenger walkway<br>• ~280 feet long for location 1 and ~160 feet long for locations 2 and 3<br>• Minimum vertical clearance of 10 feet within the walkway interior |
| Maintenance and Storage Facility (MSF) | • Primarily located on private property to be acquired by the City as part of the proposed Project with potential for portions | • ~75,000 sf building area<br>• Up to ~75 feet in height measured from existing grade to top of roof |

**TABLE 2-1: ITC PROJECT COMPONENT LOCATIONS AND SIZES (CONCEPTUAL)**

| Project Component | General Location | Approximate Size |
|---|---|---|
| | of the MSF to be located within an easement at 500 E. Manchester Blvd. The MSF would share the property with a rebuilt Vons grocery store. | • Surface parking area under building containing approximately 50 spaces for employees and visitors |
| Power Distribution System Substation (PDS) | • Two PDS substations; one located at the MSF site and the second at the Prairie/Hardy Station site.<br>• Specific locations within each site will be determined during the design phase | • ~30 feet wide x ~100 feet long<br>• Up to ~20 feet clearance height measured from floor to ceiling<br>• If located below grade, an additional space of ~30 feet wide x ~30 feet long for vertical circulation<br>• ~20 feet wide x ~40 feet long additional space for auxiliary equipment such as a backup generator, if necessary |
| Roadway Improvements | • Market St., Manchester Blvd. and Prairie Ave will be reconstructed to accommodate the ITC guideway, the existing number of traffic lanes will be maintained. Prairie Avenue will be shifted eastward up to ~28 feet | • New roadway striping, lane reconfigurations, partial relocation, on-street parking adjustments, new sidewalks, lighting improvements, traffic signal adjustments, landscaping, and streetscape |
| Pick-Up/Drop-Off Areas, Surface Parking Lots and Staging Areas During Construction | • Market St./Florence Ave. Station site<br>• 150 S. Market St.<br>• Prairie/Hardy Station site | • Surface level parking at each site:<br>~650 spaces at Market St./Florence Ave. Station<br>~50 spaces at 150 S. Market St.<br>~50 spaces at Prairie/Hardy Station Pick-Up/Drop-Off Area<br>• Market St./Florence Ave. Station site on Locust St. south of Florence Ave., and Regent St. between Locust St. and Market St.<br>• Prairie/Hardy St. Station within the Station site |

**Source**: City of Inglewood, *Inglewood Transit Connector Project Environmental Impact Report*, February 2022.

# 2.3 CONSTRUCTION ACTIVITIES

Construction would occur in multiple phases over approximately 46 months between January 2024 and November 2027. Construction of the new replacement Vons would occur prior to construction of the ATS System. The following is a summary of the planned construction phases. For additional details, refer to the Inglewood Transit Connector Project Baseline Construction Phasing Narrative (June 2021) provided in Appendix W of the Draft EA.

## 2.3.1 CONSTRUCTION PHASING

The construction phasing represents a reasonable set of assumptions to inform the environmental analysis. Prior to Phase 1 construction activities being initiated on the MSF site, the owner/operator of the Vons supermarket currently located on this site would demolish the existing Vons gas station on the corner of Manchester Boulevard and Spruce Avenue and pave this area for use as a parking area for the new Vons store to be built on the corner of Manchester Boulevard and Hillcrest Boulevard. This construction would occur over an approximate 10-month period prior to Phase 1 of the ITC construction. The eight construction phases are described below and would include various surface and aerial construction activities.

- Phase 1 would include demolition of buildings and site improvements on properties acquired for construction of the proposed Project, the beginning of construction of the MSF, trenching and installation of primary power duct bank, and preparatory work on the east side of Prairie Avenue to allow for the roadway shift. After demolition, the remaining asphalt flatwork areas at the commercial plaza at Market and Regent Streets, the commercial building at 150 South Market Street, and the retail commercial center at the northwest corner of Prairie Avenue and Hardy Street, would provide space for construction staging, including but not limited to, space for equipment storage, material staging and storage, contractor jobsite trailers, and on-site parking for construction staff throughout the entire Project duration.
- Phase 2 would include activities to enable the construction sequence of the guideway along Prairie Avenue from Hardy Street to Manchester Boulevard, and work at the MSF site.
- Phase 3 would include foundation work for the ATS guideway, foundation work for the Market Street/Florence Avenue Station, and construction for the support structure of the MSF building. Phase 3 work would include utility relocation (if necessary), foundations, columns, and setting of the PDS substations.
- Phase 4 would include foundation work for the ATS guideway, guideway column caps along Market Street, and the MSF building deck and shell. Phase 4 activities would include utility relocation (if necessary), foundations, CIP columns, guideway column caps, and installation of equipment at the PDSs.
- Phase 5 would include aerial work for the ATS guideway along Prairie Avenue from Hardy Street to Manchester Boulevard and Manchester Boulevard from Prairie Avenue to Market Street, guideway girder along Market Street, and MSF building interior construction. Phase 5 activities would include guideway girders, guideway straddle caps, and installation of equipment at the PDSs.
- Phase 6 would include completion of the Prairie Avenue/Manchester Boulevard Station, completion of Hardy Station, and completion of the MSF building, and the elevated passenger walkway to the Metro K Line Downtown Inglewood Station.
- Phase 7 would include final site work and completion of the stations.
- Phase 8 would occur for the guideway along the entire length of the alignment and primarily includes installation of the operating systems and testing and commissioning of the ATS trains.

### 2.3.2 CONSTRUCTION HOURS

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

Due to site constraints, particularly along Prairie Avenue and Manchester Boulevard, just-in-time deliveries of construction materials would be required during off-peak hours and/or night hours. Additionally, construction of the elevated guideway, columns and station components that could impact Prairie Avenue and Manchester Boulevard would be primarily constructed during the off-peak hours and night hours to minimize impacts to daily commuter traffic and potential event traffic. Delivery of construction materials would occur during the night shift, as would most temporary lane closures. Construction activities during the day shift would primarily consist of work that could proceed without requiring lane closures or material disruption to daily commuter traffic and potential event traffic along Prairie Avenue and Manchester Boulevard. Additionally, it can be anticipated that some minor activity would occur during periods in between construction shifts for logistics, moving equipment, etc. Pursuant to the Inglewood Municipal Code, any construction between the hours of 8:00 p.m. and 7:00 a.m. will require the approval of a permit from the Permits and License Committee of the City.

### 2.3.3 UTILITIES

A Utility Report prepared for the proposed Project evaluated potential conflicts with the proposed Project columns and the existing utility lines along the alignment (Appendix G of the Draft EA). Based upon the Utility Report, it appears that several utility lines within the Market Street, and Prairie Avenue segments would conflict with proposed Project columns. The location of utilities is based on a review of existing documentation and the exact locations have not been field verified. Several storm drains have been identified along these segments which may require relocation due to column placement. In addition, SCE has determined that the proposed Project would likely utilize the existing 16 kva (1,000 volt amps) circuit located within the of Market Street right-of-way, although utilization of this existing circuit would require infrastructure upgrades to accommodate the proposed Project.

### 2.3.4 CONSTRUCTION EQUIPMENT

Off-road construction equipment would include auger drill rigs and/or pile drivers, excavators, backhoes, loaders, cranes, drill rig trucks, compactors, and other heavy-duty construction equipment that is not licensed for travel on public highways. Off-road equipment is inventoried based on equipment type, model, and horsepower rating. On-road on-site equipment would include shuttle vans transporting construction employees to and from the site(s), on-site pick-up trucks, crew vans, water trucks, dump trucks, haul trucks, street sweepers, and other on-road vehicles licensed to travel on public roadways.

### 2.3.5 WORKFORCE ESTIMATES

The proposed workforce estimate is based on the phases of construction, which may overlap in any calendar year. Including all contractor staff and specialty on-site professionals, the maximum daily workforce would be approximately 100 for Phase 1, 140 for Phase 2, 200 for Phase 3, 240 for Phase 4, 240 for Phase 5, 200 for Phase 6, 125 for Phase 7, and 100 for Phase 8.

### 2.3.6 CONSTRUCTION STAGING AREAS AND EMPLOYEE CONTRACTOR PARKING

To the extent possible, construction laydown, staging areas, and employee contractor parking for the proposed Project would be located within the alignment for the proposed facilities. The potential staging areas include the sites for all three stations, the MSF site, and the properties at 150 South Market Street Market Street. Further, City-owned lots near the northeast corner of Market Street and Manchester Boulevard, and others near the proposed Project could be used for construction employee parking. For the MSF site, a portion of the site outside the active construction footprints of the MSF and PDS substation would be used for minor construction staging, such as materials storage. Most of the site is proposed to be occupied by the reconstructed Vons and associated parking. Additionally, equipment and materials storage would also take place in the linear staging areas in the form of one lane of roadway along the length of alignment separated by K-rail. At each construction staging area, the contractor would implement, as necessary, security and screen fencing, surveillance cameras, security personnel, and the locking and securing of equipment. Additionally, the proposed Project would incorporate various temporary construction fencing features to screen much of the construction activities along major public approaches and perimeter roadways. If necessary, contractor employees would be shuttled between construction sites and contractor employee parking areas within one mile of the proposed Project, as needed.

### 2.3.7 HAUL ROUTES

The primary delivery and haul routes proposed during construction are Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard, which have been designated by the City as appropriate for heavy truck use. Delivery and haul routes would convey materials to and from regional routes, including the I-105 (Glen Anderson Freeway) and I-405 (San Diego Freeway). It is anticipated that the haul routes closest to the respective work and staging areas of the Project alignment will be used. Excavated dirt materials may be hauled at night, where possible, due to the busier freeways and surface streets around or near the excavation site during daytime hours.

### 2.3.8 CONSTRUCTION COMMITMENT PROGRAM

As part of the Project, the City of Inglewood has developed a Construction Commitment Program (CCP) (Appendix I of the Draft EA) to pro-actively address the effects of the construction of the ATS project on the community. This program includes the following programs and plans:

- Business Community and Support Program
- Business Assistance Program
- Transit Access and Circulation Program
- Construction Staging and Traffic Control Program
- Parking Management Plan
- Air Quality Program
- Visual Resources Program
- Hazardous Materials Program
- Tree Removal and Replacement Plan

To address the effects of the construction activities on traffic conditions, the City would establish a Project Task Force to develop a Construction Staging and Traffic Control Plan to address:

- Coordination with other public infrastructure projects within the City's boundaries;
- Detour routes, including analysis of impacts to pedestrian, business, bicycle, and traffic flow;
- Coordination of closures and restricted access during the construction period with special attention during periods of expected heavy traffic from events scheduled at SoFi Stadium and other venues in the LASED at Hollywood Park, the Forum, and the IBEC including the Intuit Dome;

- Coordination with the City, police, and fire services department regarding maintenance of emergency access and response times;
- Monitoring and coordination of construction materials deliveries; and
- Notification to businesses and residents on upcoming construction activities including but not limited to the establishment of a website with Project construction information, signage, and web-based media.

All haul routes and activities would need to be reviewed and approved with truck deliveries of bulk materials and hauling of soil scheduled during off-peak hours to the extent feasible and on designated routes including freeways and nonresidential streets. Parking, staging, or queuing of Project-related vehicles, including workers' vehicles, trucks, and heavy vehicles, would be prohibited on City streets at all times except in defined workspace areas defined in the Construction Staging and Traffic Control Program. Construction noise reduction measures would minimize noise through the use of temporary noise barriers, and restrictions on the use of heavy equipment that create vibration near sensitive uses and buildings, and other measures. Contact information for a Community Affairs Liaison would be posted throughout the construction area. This liaison would respond to any noise complaints within 24 hours. The air emissions reduction measures require use of the best commercially available equipment meeting the highest standard for minimizing air emissions and the use of electric powered equipment or equipment not powered by diesel engines, where possible. To ensure that any hazardous materials encountered during construction are appropriately addressed, building demolition, hazardous materials contingency, soils management, and health and safety plans would be prepared and implemented during construction. All lighting needed to support construction activities would be required to meet defined standards to avoid impacts to adjacent uses and all stockpile area would be required to be in the least visible areas as approved by the City. Removal of trees and other landscaping would be minimized and any trees removed will be replaced within six months of work being completed in affected areas.

The City would create a $5 million dollar Business Assistance Fund to provide financial assistance through grants to eligible businesses affected by construction of the Project. In addition, the CCP includes business and community support programs to address businesses financially affected by construction of the proposed Project addressing:

- Advertising support for local businesses in local or regional newspapers and social media.
- Notice of plans to all affected property owners of the schedule for specific planned construction activities, changes in traffic flow, and required short-term modifications to property access.
- Notice of plans to all affected property owners if utilities would be disrupted for short periods of time and ensuring major utility shut-offs are scheduled during low-use periods of the day.
- Methods by which business owners can convey their concerns about construction activities and the effectiveness of measures during the construction period so activities can be modified to reduce adverse effect.
- Access plans that ensure that all businesses, service providers, and residents are provided with adequate access during construction. Where there is a significant limited English population, signage shall be provided in various languages (as appropriate).
- Funding for temporary signage during construction to help businesses that are partially blocked or that have inconvenient access due to construction activity.

# 3.0 REGULATORY FRAMEWORK

## 3.1 FEDERAL REGULATIONS

### 3.1.1 NATIONAL ENVIRONMENTAL POLICY ACT

The National Environmental Policy Act of 1969, as amended, established that the federal government must use all practicable means to ensure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings. The CEQ regulations, which establishes the steps necessary to comply with NEPA, requires evaluation of the potential environmental consequences of all proposed federal activities and program.

### 3.1.2 COUNCIL ON ENVIRONMENTAL QUALITY ENVIRONMENTAL JUSTICE GUIDANCE

A *Presidential Memorandum* accompanied Executive Order 12898, stating that "each Federal agency shall analyze the environmental effects, including human health, economic and social effects, of Federal actions, including effects on minority communities and low-income communities, when such analysis is required by [NEPA]." The Council of Environmental Quality (CEQ) responded to this order by issuing *Environmental Justice Guidance under the National Environmental Policy Act* (CEQ 2017) for agencies on how to address EJ under NEPA. The CEQ *Environmental Justice Guidance* includes general principles for addressing EJ during the NEPA process, such as considering relevant public health data; recognizing interrelated cultural, social, occupational, historical, or economic factors; and developing effective public participation strategies.

### 3.1.3 EXECUTIVE ORDER 12898, FEDERAL ACTIONS TO ADDRESS ENVIRONMENTAL JUSTICE IN MINORITY POPULATIONS AND LOW-INCOME POPULATIONS

Executive Order 12898, signed by President Clinton in February 1994, directs federal agencies to take appropriate and necessary steps to identify and address disproportionately high and adverse effects of their projects on the health or environment of minority and low-income populations to the greatest extent practicable and permitted by law. Executive Order 12898 also directs federal actions, including transportation projects, to use existing law to avoid discrimination on the basis of race, color, or national origin, and to avoid disproportionably high and adverse impacts on minority and low-income populations. These populations are often referred to as EJ populations.

In August 2011, a Memorandum of Understanding on EJ and Executive Order 12898 was issued stressing the importance of identifying and addressing EJ considerations in federal agency programs, policies, and activities as provided in Executive Order 12898. It states, “each Federal agency will identify and address, as appropriate, any disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations, including, but not limited to, as appropriate for its mission, in the following areas: (1) implementation of the NEPA; (2) implementation of Title VI of the Civil Rights Act of 1964, as amended; (3) impacts from climate change; and (4) impacts from commercial transportation and supporting infrastructure (“goods movement”).” *The Age Discrimination Act of 1975* prohibits the discrimination based on age of individuals from having meaningful access and participating in federally funded programs.

### 3.1.4 U.S. DEPARTMENT OF TRANSPORTATION ORDER 5610.2(A), ORDER TO ADDRESS ENVIRONMENTAL JUSTICE IN MINORITY POPULATIONS AND LOW-INCOME POPULATIONS

In response to Executive Order 12898, USDOT issued *Order to Address Environmental Justice in Minority Populations and Low-Income Populations* (USDOT Order 5610.2(a)), which established the procedures to use in order to comply with Executive Order 12898 in order to avoid disproportionately high and adverse effects on minority and low-income populations.

Three fundamental EJ principles are as follows:

- To avoid, minimize, or mitigate disproportionally high and adverse human health or environmental effects, including social and economic effects, on minority populations and low-income populations;
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority population and low-income populations

USDOT Order 5610.2(a) sets forth USDOT policy to consider EJ principles in all USDOT programs, policies and activities. It describes how the objectives of EJ will be integrated into planning and programming, rulemaking, and policy formulation. The order sets forth steps to prevent disproportionately high and adverse effects to minority or low-income populations through Title VI analyses and EJ analyses conducted as part of federal transportation planning and NEPA provisions. It also describes the specific measures to be taken to address instances of disproportionately high and adverse effects and sets forth relevant definitions. The order clarifies the distinction between a Title VI analysis and an EJ analysis conducted as part of a NEPA review and affirms the importance of considering EJ principles as part of early planning activities in order to avoid disproportionately high and adverse effects.

### 3.1.5 FTA CIRCULAR 4702.1B, TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT ADMINISTRATION RECIPIENTS

FTA Circular 4702.1B was issued on October 1, 2012. This circular provides recipients of FTA financial assistance with guidance and instructions necessary to carry out the USDOT Title VI regulations and to integrate into their programs and activities considerations expressed in the USDOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons. Title VI prohibits discrimination by recipients of federal financial assistance on the basis of race, color, and national origin, including the denial of meaningful access for limited LEP persons. Objectives of FTA Circular 4702.1B are to help FTA federal funding recipients to:

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; and
- Ensure meaningful access to transit-related programs and activities by persons with LEP.

### 3.1.6 FTA CIRCULAR 4703.1, ENVIRONMENTAL JUSTICE POLICY GUIDANCE FOR FTA RECIPIENTS

In August 2012, FTA made available FTA Circular 4703.1, which provides recommendations to State Departments of Transportation, Metropolitan Planning Organizations, public transportation providers, and other recipients of FTA funds on how to fully engage EJ populations in the decision-making process; how to analyze or determine whether EJ populations would be subjected to disproportionately high and adverse human health or environmental effects as a result of a transportation project; and how to avoid, minimize, or mitigate such effects. The circular does not contain any new requirements, policies, or directives, but instead

provides more detailed discussions of public outreach strategies, includes advice on how to develop and gather meaningful demographic information, and provides guidance on deciding whether an EJ population in the study area is "meaningfully greater" than the EJ population in the general population.

### 3.1.7 TITLE VI OF THE CIVIL RIGHTS ACT

Title VI of the *Civil Rights Act of 1964* and related statutes require federally assisted programs not to discriminate on the basis of race, color, national origin, age, sex, or disability (religion is a protected category under the *Fair Housing Act of 1968).* Title VI of the *Civil Rights Act of 1964* declared "it to be the policy of the United States that discrimination on the ground of race, color, or national origin shall not occur in connection with programs and activities receiving federal financial assistance and authorizes and directs the appropriate Federal departments and agencies to take action to carry out this policy."

## 3.2 STATE REGULATIONS

### 3.2.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT

State law defines EJ in California Government Code Section 65040.12, as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies." While there is no requirement under CEQA to address environmental justice, California law requires the Office of Planning and Research to coordinate with federal agencies regarding EJ based on Executive Order 12898.

### 3.2.2 CALTRANS STANDARD ENVIRONMENTAL REFERENCE HANDBOOK VOLUME 4: COMMUNITY IMPACTS ASSESSMENT

The Standard Environmental Reference provides a single, standard reference on compliance with NEPA and related federal laws, executive orders, regulations, and policies. Volume 4 of the Standard Environmental Reference Handbook contains guidance to identify EJ populations and to identify disproportionately high and adverse effects on minority and low-income populations. It provides several ways to ensure a successful public involvement process, particularly for the EJ population.

## 3.3 REGIONAL REGULATIONS

### 3.3.1 METRO 2020 LONG RANGE TRANSPORTATION PLAN

Metro includes guidelines and planning policies regarding EJ issues in its current *2020 Metro Long Range Transportation Plan* (LRTP). Metro's LRTP evaluates how much additional transit service would be provided in areas with high transit dependency and minority populations. The LRTP defines transit dependent areas as those Census tracts with a higher number of low-income, zero-car households, or senior households than the countywide average. The LRTP includes extensive transit investments and policies about placement of these investments in proximity to areas with minority and lower-income populations and to job opportunities that support those areas. The Project is included in the LRTP.

## 3.4 LOCAL REGULATIONS

### 3.4.1 CITY OF INGLEWOOD GENERAL PLAN

The City's General Plan links the city's community values, visions and objectives with the way the City uses its public and private land and other community resources. The *Environmental Justice Element of the General Plan*, adopted April 2020, includes goals and policies aimed at addressing land use and equity issues

throughout the City, including reducing the population's exposure to environmental hazards. **Table 3-1** lists the applicable EJ-related policies of the City's General Plan.

**TABLE 3-1: RELEVANT CITY OF INGLEWOOD GENERAL PLAN ENVIRONMENTAL JUSTICE ELEMENT POLICIES**

| Policy | Description |
|---|---|
| Policy EJ-2.4 | Create land use patterns and public amenities that encourage people to walk, bicycle and use public transit. |
| Policy EJ-2.8 | Encourage new development to reduce vehicle miles traveled to reduce pollutant emissions. |
| Policy EJ-2.12 | 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. |
| Policy EJ-2.13 | Continue to reduce pollution entering the storm drain system through the incorporation of best management practices. |
| Policy EJ-2.18 | Work with the Inglewood Unified School District to minimize environmental hazards in and around educational facilities. |

**SOURCE**: City of Inglewood, 2020

# 4.0 METHODOLOGY

The following discusses the approach used to identify the affected area of the proposed Project, define EJ populations, and if the proposed Project would result in disproportionately high and adverse effects to the EJ population identified within the EJ Affected Area.

## 4.1 DEFINING AFFECTED COMMUNITIES

The City is comprised of the following neighborhoods: Arbor Village, Centinela Heights, Century Heights, Fairview Heights, Imperial Village, Industrial, Inglewood Knolls, La Tijera Village, Lockhaven, Morningside Park, and Sports Village. The Project corridor includes the approximately 1.6-mile alignment that will connect Metro K (Crenshaw/Los Angeles International Airport (LAX)) Line Downtown Inglewood Station to Prairie Avenue/Hardy Street through the Imperial Village neighborhood.

For purposes of analyzing direct adverse effects to the EJ population, the EJ Affected Area is defined as the areas located within 0.25 mile of the Project alignment, parking facilities, MSF, and station areas. The EJ Affected Area includes the City of Inglewood neighborhoods of Arbor Village, Centinela Heights, Fairview Heights, Industrial, Lockhaven, Morningside Park, and Sports Village. The populations who reside within the EJ Affected Area are referred to in this technical report as EJ populations.

The "affected area" analyzed for each environmental topics varies depending on the environmental topic of concern. The "Summary of Effect" for each environmental topic in Section 5, Environmental Consequences Section 6 Construction Effects, is based on analysis conducted within that "affected area" of analysis for each environmental topic of concern. The effects of Project operations and construction, benefits to EJ communities, health effects, and other potential effects are generally discussed for and focused on the EJ Affected Area. This analysis will determine if Project construction or operation would result in disproportionately high and adverse effects to the EJ communities identified in the EJ Affected Area.

## 4.2 DATA GATHERING

To identify EJ communities within the EJ Affected Area and determine whether the proposed Project would result in disproportionately high and adverse effects to these communities, data was gathered related to race, median household income, households, and age demographics at the block-group level for the City, the EJ Affected Area, and each City-designated neighborhood.

Demographic and socioeconomic characteristics presented in this impact analysis report were derived from the United States Census Bureau's 2016-2019 American Community Survey (ACS) 5-Year. Data for Los Angeles County and City was aggregated at the census-designated place (CDP) level. Data for the City of Inglewood-designated neighborhoods was derived at the census block group level and aggregated based on the block groups whose geographic center is contained by the boundary of each neighborhood. The demographic and socioeconomic data presented in this impact analysis report can be understood as accurate descriptions of the demographic and socioeconomic characteristics estimated and projected for the block groups that encompass the EJ Affected Area. The characterization and boundaries of the City of Inglewood-designated neighborhoods within the EJ Affected Area is also based on a review of local general plans, land use and zoning maps, and geographical mapping files provided by the City.

Base Year 2019 community-related data in the EJ Affected Area are derived from the census block level 2016-2019 ACS 5-Year Estimates, which is the most current data available.

# 4.3 DEFINING ENVIRONMENTAL JUSTICE COMMUNITIES

In determining EJ communities and populations, comprehensive demographic information was researched using the 2016-2019 ACS 5-Year Estimates at the census-designated place and census block group level, as applicable. Using these databases, the makeup of minority and low-income populations are identified.

The FTA Circular 4703.1 and guidance from the CEQ were used to determine whether the EJ Affected Areas consist of EJ communities and populations. The 1997 CEQ's *Environmental Justice: Guidance under the National Environmental Policy* states, "Minority populations should be identified where either (a) the minority population of the affected area exceeds 50 percent or (b) the population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis." For this analysis, the unit of geographic analysis was the EJ Affected Area and the comparison geographic unit is Los Angeles County. Los Angeles County was chosen as the geographic unit of analysis because the City is located in Los Angeles County and it would not artificially dilute or inflate the minority or low-income population identified for this study.

Based on the CEQ *Environmental Justice Guidance under the National Environmental Policy Act*, a community is considered an EJ community if any of the following criteria is met:

- At least 50 percent of the population in the affected community is minority or low-income; or
- The minority or low-income population in the affected community is meaningfully greater than the general population in the appropriate geographic unit of analysis. For this study, 10 percent is considered statistically meaningful greater than the population in Los Angeles County (based on similar to the Metro studies and methodologies used throughout the Metro service areas).

## 4.3.1 DEFINITION OF MINORITY POPULATIONS

USDOT Order 5610.2(a) and subsequent agency guidance on EJ provides clear definitions of minority groups addressed by Executive Order 12898. USDOT defines minority groups as:

- **Black** refers to people having origins in any of the black racial groups of Africa;
- **Hispanic** includes persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race;
- **Asian American** refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent (including for example Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, Philippine Islands, Thailand, and Vietnam);
- **American Indian and Alaskan Native** refers to people having origins in any of the original people of North and South America (including Central America), and who maintain cultural identification through tribal affiliation or community attachment;
- **Native Hawaiian or Other Pacific Islander** refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

A “minority population” means any readily identifiable group or groups of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed or transient persons (such as migrant works or Native Americans) who will be similarly affected by a proposed program, policy or activity.

### 4.3.2 DEFINITION OF LOW-INCOME POPULATIONS

USDOT Order 5610.2(a) and subsequent agency guidance on EJ defines "low-income" as a person whose median household income is at or below the United States Department of Health and Human Services (HHS) poverty guidelines. However, FTA Circular 4703.1 also states that a locally developed threshold, such as that used for FTA's grant program or a percentage of median income for the area is appropriate, provided that the threshold is at least as inclusive as the HHS poverty guidelines. For this study, the United States Department of Housing and Urban Development (HUD) threshold of income limits is used to define "low-income." Per HUD, low-income is a person whose household income is 80 percent or less than the median household income for the area. Los Angeles County is used as the geographical area because the City is located in Los Angeles County and would not artificially dilute or inflate the minority or low-income population identified for this study. The 2019 median household income for Los Angeles County ($68,044). A median household income approximately 73 percent of Los Angeles County ($50,000) is used as the low-income threshold.[1]

A "low-income population" means any readily identifiable group or groups of low-income persons who live in geographic proximity, and if circumstances warrant, geographically dispersed or transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed program, policy or activity.

## 4.4 DEFINING ENVIRONMENTAL JUSTICE EFFECTS

The EJ analysis starts with a determination as to whether minority populations and/or low-income populations would experience potential environmental or health impacts from an alternative. The analysis compares the burdens and benefits of the proposed activity experienced by EJ populations with those experienced by non-EJ populations. This analysis examines if an alternative would result in disproportionately high and adverse effects to the EJ population identified within the EJ Affected Area.

USDOT Order 5610.2(a) defines "disproportionately high and adverse effect on human health or the environment" as those impacts that are:

- Predominately borne by a minority population and/or a low-income population; or
- Suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.

Consistent with the USDOT Order 5610.2(a) and the FTA Circular 4703.1, when determining whether environmental effects of the Project on EJ populations are disproportionately high and adverse, the following were considered to the extent practicable:

- Will the project result in "adverse effects?"
- Will the project result in adverse effects predominately borne by an EJ population?
- Will the project result in adverse effects that would be suffered by the EJ population that would be appreciably more severe or greater in magnitude than the adverse effects that would be suffered by the non-EJ population?
- Does the project propose mitigation and/or enhancement measures?
- Are there project benefits (off-setting benefits) that would accrue to the EJ population as compared to non-EJ populations?

[1] The HUD considers low-income is a person whose median household income is 80 percent for the geographical area of comparison. However, the US Census Table B19013 presents the median household income at the County, City, and census block group level, as well as the total number of households whose annual income is below $50,000, or within specified income ranges (i.e., $50,000 - $59,999; $60,000 - $74,999). To simplify analysis, $50,000, which represents 73% of the Los Angeles County median household income, was selected as the threshold of significance.

- Does the project affect a resource that is especially important to an EJ population? For example, does the project affect a resource that serves an especially important social, religious, or cultural function for an EJ population?

The benefits and burdens to EJ populations (particularly areas with the highest concentration of EJ populations) are compared with areas with the lowest concentration of EJ populations and comparable non-EJ populations.

# 5.0 AFFECTED ENVIRONMENT

## 5.1 RACE AND ETHNICITY

### 5.1.1 CITYWIDE

The Affected Area includes several different racial and ethnic groups. As defined by the United States Census Bureau, "race" included in the census questionnaire generally reflects a social definition of race recognized in this country and does not attempt to define race biologically, anthropologically, or genetically. In addition, it is recognized that the race categories include racial and national origin or sociocultural groups. People may choose to report more than one race to indicate their racial mixture. People who identify their origin as Hispanic, Latino, or Spanish may be of any race. **Table 5-1** shows the racial characteristics of Los Angeles County, the City of Inglewood, and for each City of Inglewood-designated neighborhood.

**TABLE 5-1: RACIAL CHARACTERISTICS OF THE CITY OF INGLEWOOD NEIGHBORHOODS**

| | Percent Share of Total Population[1,2] | | | | | | |
|---|---|---|---|---|---|---|---|
| **Community[3]** | **White Only** | **Black Only** | **American Indian or Alaskan Native Only** | **Asian Only** | **Native Hawaiian / Pacific Islander Only** | **Some Other Race Only** | **Two or More Races[4]** |
| Los Angeles County | 51.3% | 8.1% | 0.7% | 14.6% | 0.3% | 21.0% | 4.0% |
| City of Inglewood | 27.9% | 40.9% | 1.1% | 2.1% | 0.5% | 23.5% | 4.1% |
| Arbor Village | 37.6% | 20.4% | 1.6% | 1.7% | 2.0% | 32.7% | 4.0% |
| Centinela Heights | 21.0% | 52.8% | 0.6% | 4.0% | 0.1% | 15.5% | 6.0% |
| Century Heights | 3.8% | 81.6% | 0.3% | 0.1% | 0.0% | 7.4% | 6.8% |
| Fairview Heights | 35.7% | 31.1% | 0.7% | 0.8% | 0.0% | 27.0% | 4.8% |
| Imperial Village | 36.4% | 41.6% | 0.0% | 4.1% | 0.0% | 16.6% | 1.3% |
| Industrial | 39.8% | 39.6% | 4.0% | 4.8% | 0.0% | 4.2% | 7.6% |
| Inglewood Knolls | 11.2% | 70.8% | 1.0% | 1.8% | 0.0% | 13.4% | 1.8% |
| La Tijera Village | 25.4% | 58.8% | 0.3% | 3.4% | 0.0% | 3.0% | 9.1% |
| Lockhaven | 40.2% | 18.0% | 1.0% | 1.2% | 0.0% | 37.6% | 2.0% |
| Morningside Park | 8.5% | 80.6% | 0.0% | 1.5% | 0.5% | 5.6% | 3.4% |
| Sports Village | 22.4% | 44.0% | 1.7% | 2.7% | 0.0% | 25.3% | 4.0% |

[1] Data is from US Census Bureau, 2016-2019 ACS 5-Year Estimates, Table B02001 RACE.

[2] This table includes race only and does not distinguish by ethnicity (Hispanic/Latino by origin). People who identify their origin as Hispanic, Latino, or Spanish may be of any race.

[3] Los Angeles County and City of Inglewood data is aggregated at the census-designated place level. Data for the City of Inglewood neighborhoods is aggregated by census block groups whose geographic center (centroid) is contained by each neighborhood boundary. The neighborhood boundaries are designated by the City of Inglewood.

[4] Two or more races includes subcategories: "Two races including some other race" and "Two race excluding some other race, and three or more races".

**SOURCE**: US Census Bureau, 2019; TAHA, 2022

The United States Census Bureau defines "ethnicity" as either "Hispanic or Latino" or "Not Hispanic or Latino." "Hispanic or Latino" is defined as a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race. People who identify as Hispanic, Latino, or Spanish may be any race.

**Table 5-2** shows the ethnicities of Los Angeles County, the City of Inglewood, and City-designated neighborhood. A community is considered an EJ community if the minority population in the affected community is at least 10 percent higher than the average of the minority population in Los Angeles County.

The percent of minority population for Los Angeles County is 73.8 percent; therefore, 10 percent higher is 83.8 percent. The percent minority population more than 10 percent higher than that for Los Angeles County include the City of Inglewood neighborhoods of Arbor Village, Centinela Heights, Century Heights, Fairview Heights, Imperial Village, Industrial, Inglewood Knolls, La Tijera Village, Lockhaven, Morningside Park, Sports Village.

**TABLE 5-2: ETHNIC CHARACTERISTICS OF THE CITY OF INGLEWOOD NEIGHBORHOODS**

| | Percent Share of Total Population[1,2] | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | Non-Hispanic | | | | | | |
| Community[3,4] | Total Minority[5] | Hispanic of Any Race | White Only | Black Only | Amer. Indian/ Alaskan Native Only | Asian Only | Native Hawaiian / Pacific Islander Only | Some Other Race Only | Two or More Races[6] |
| Los Angeles County | 73.8% | 48.5% | 26.2% | 7.8% | 0.2% | 14.4% | 0.2% | 0.3% | 2.3% |
| City of Inglewood | 95.5% | 50.6% | 4.5% | 39.6% | 0.3% | 2.0% | 0.4% | 0.4% | 2.2% |
| Arbor Village | 95.8% | 70.8% | 4.2% | 19.5% | 0.1% | 1.7% | 1.8% | 0.2% | 1.8% |
| Centinela Heights | 91.2% | 32.5% | 8.8% | 52.0% | 0.2% | 3.6% | 0.1% | 0.3% | 2.6% |
| Century Heights | 97.7% | 13.1% | 2.3% | 79.6% | 0.3% | 0.1% | 0.0% | 0.2% | 4.4% |
| Fairview Heights | 94.8% | 62.3% | 5.2% | 28.0% | 0.0% | 0.8% | 0.0% | 0.7% | 3.1% |
| Imperial Village | 93.6% | 47.5% | 6.4% | 40.9% | 0.0% | 4.1% | 0.0% | 0.0% | 1.0% |
| Industrial | 86.8% | 40.7% | 13.2% | 39.0% | 0.3% | 3.5% | 0.0% | 0.2% | 3.2% |
| Inglewood Knolls | 98.6% | 23.5% | 1.4% | 70.1% | 0.0% | 1.8% | 0.0% | 2.5% | 0.6% |
| La Tijera Village | 86.8% | 21.4% | 13.2% | 57.6% | 0.3% | 3.4% | 0.0% | 0.0% | 4.0% |
| Lockhaven | 97.4% | 77.7% | 2.6% | 17.6% | 0.3% | 1.2% | 0.0% | 0.1% | 0.5% |
| Morningside Park | 97.3% | 12.2% | 2.7% | 80.1% | 0.0% | 1.5% | 0.2% | 0.2% | 3.0% |
| Sports Village | 98.2% | 48.8% | 1.8% | 42.2% | 1.5% | 2.6% | 0.0% | 0.8% | 2.3% |

[1] Data is from US Census Bureau, 2016-2019 ACS 5-Year Estimates
[2] People who identify their ethnic origin as Hispanic, Latino, or Spanish may be of any race.
[3] Los Angeles County and City of Inglewood data is aggregated at the census-designated place level. Data for the City of Inglewood neighborhoods is aggregated by census block groups whose geographic center (centroid) is contained by each neighborhood boundary. The neighborhood boundaries are designated by the City of Inglewood.
[4] A community is considered an EJ community if the minority population in the affected community is at least 10 percent higher than the average of the minority population in Los Angeles County. The percent of minority population for Los Angeles County is 73.8 percent; therefore, 10 percent higher is 83.8 percent.
[5] A minority is defined as an individual who identifies as any race or ethnicity except for non-Hispanic/Latino White Alone. Percent of minority population is determined using 2016-2019 ACS 5-year estimates for the census block groups that intersect both the EJ Affected Area and Affected Communities.
[6] Two or more races includes subcategories: "Two races including some other race" and "Two race excluding some other race, and three or more races".
**SOURCE**: US Census Bureau, 2019; TAHA, 2022

## 5.1.2 EJ AFFECTED AREA

As discussed in Section 4.1, the EJ Affected Area is defined as the areas located within 0.25 mile of the Project alignment, parking facilities, MSF, and station areas. City-designated neighborhoods located in the EJ Affected Area include Arbor Village, Centinela Heights, Fairview Heights, Industrial, Morningside Park, Lockhaven, and Sports Village.

**Table 5-3** characterizes the racial groups of the communities in the EJ Affected Area.

**TABLE 5-3: RACIAL CHARACTERISTICS OF THE COMMUNITIES IN THE EJ AFFECTED AREA**

| Community[3] | Percent Share of Total Population[1,2] |
|---|---|

| | White Only | Black Only | Amer. Indian / Alaskan Native Only | Asian Only | Native Hawaiian / Pacific Islander Only | Some Other Race Only | Two or More Races[4] |
|---|---|---|---|---|---|---|---|
| Los Angeles County | 51.3% | 8.1% | 0.7% | 14.6% | 0.3% | 21.0% | 4.0% |
| City of Inglewood | 27.9% | 40.9% | 1.1% | 2.1% | 0.5% | 23.5% | 4.1% |
| EJ Affected Area[5] | 18.9% | 50.1% | 1.4% | 0.9% | 1.6% | 21.6% | 5.5% |
| Arbor Village | 21.6% | 33.7% | 1.2% | 0.1% | 6.9% | 30.1% | 6.4% |
| Centinela Heights[6] | 29.2% | 66.0% | 0.0% | 0.0% | 0.0% | 0.0% | 4.7% |
| Fairview Heights | 22.4% | 45.7% | 0.0% | 2.2% | 0.0% | 21.0% | 8.7% |
| Industrial[6] | 29.2% | 66.0% | 0.0% | 0.0% | 0.0% | 0.0% | 4.7% |
| Lockhaven[7] | 36.1% | 8.8% | 2.0% | 0.0% | 0.0% | 50.0% | 3.2% |
| Morningside Park | 4.4% | 88.0% | 0.0% | 1.2% | 0.0% | 1.7% | 4.8% |
| Sports Village | 19.4% | 50.8% | 2.1% | 0.8% | 0.0% | 22.4% | 4.5% |

[1] Data is from US Census Bureau, 2016-2019 ACS 5-Year Estimates, Table B02001 RACE.
[2] The US Census Bureau racial categories in the census questionnaire generally reflect a social definition of race recognized in this country and does not attempt to define race biologically, anthropologically, or genetically. In addition, it is recognized that the race categories include racial and national origin or sociocultural groups. People may choose to report more than one race to indicate their racial mixture. People who identify their origin as Hispanic, Latino, or Spanish may be of any race.
[3] Los Angeles County and City of Inglewood data is aggregated at the census-designated place level. Data for the City of Inglewood neighborhoods is aggregated by census block groups whose geographic center (centroid) is contained by each neighborhood boundary. The neighborhood boundaries are designated by the City of Inglewood.
[4] Two or more races includes subcategories: "Two races including some other race" and "Two race excluding some other race, and three or more races".
[5] The EJ Affected Area is defined as the areas located within 0.25 mile of the Project alignment, parking facilities, MSF, and station areas and represents aggregated data from US Census Bureau block groups located within EJ Affected Area.
[6] The geographic portions of the Centinela Heights and Industrial neighborhoods located within the EJ Affected Area share the same U.S. Census Bureau block group and demographic data.
[6] Lockhaven is located on the southern edge of the EJ Affected Area and is included for a provide a conservative analysis.
**SOURCE**: US Census Bureau, 2019; TAHA, 2022

**Table 5-4** shows the ethnicities of the communities in the EJ Affected Area. Each community in the EJ Affected Area has a percent minority population more than 10 percent higher than that for Los Angeles County and include the communities of Arbor Village, Centinela Heights, Fairview Heights, Industrial, Morningside Park, Lockhaven, and Sports Village.

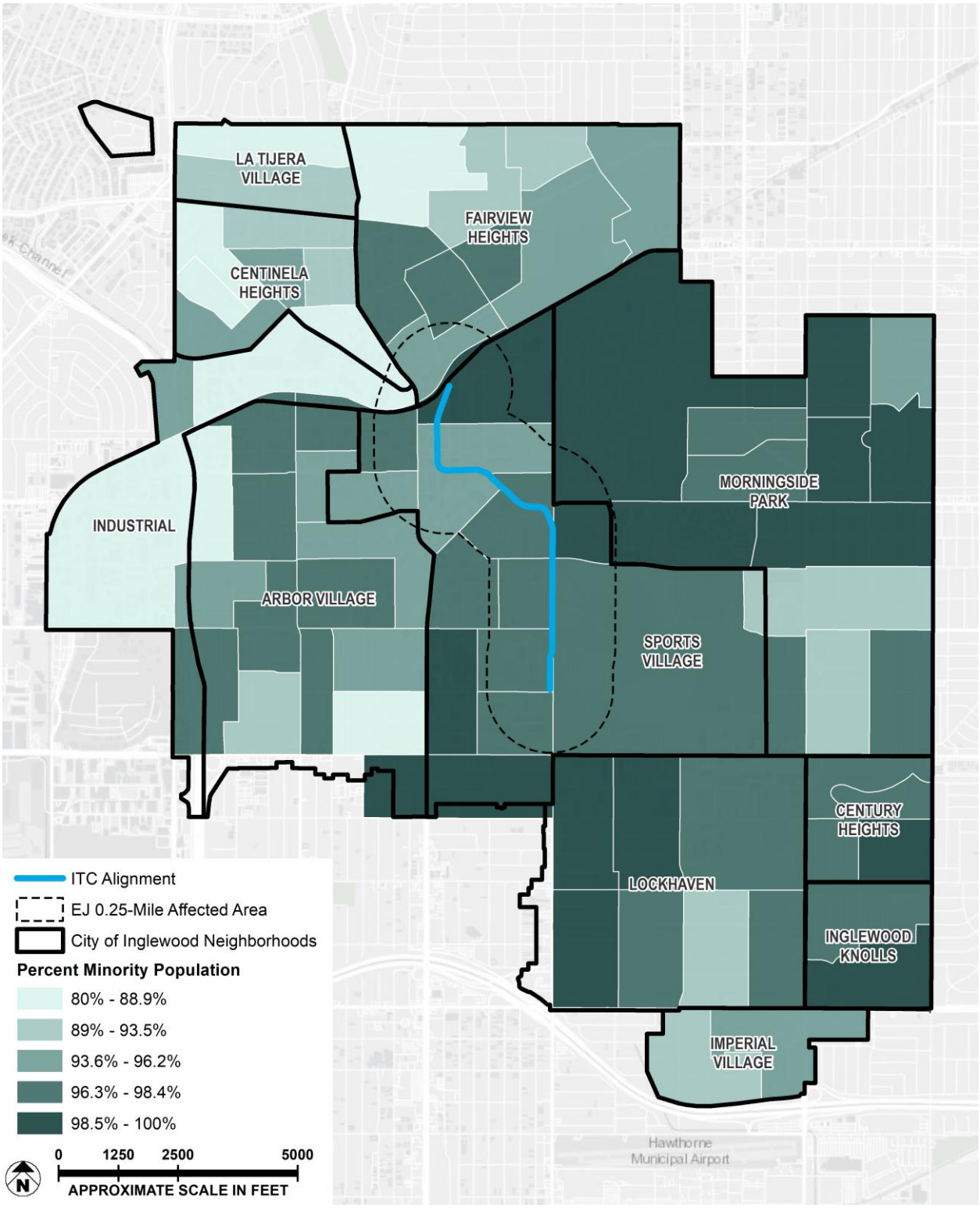
**TABLE 5-4: ETHNICITIES OF THE COMMUNITIES IN THE EJ AFFECTED AREA**

| | Percent Share of Total Population[1,2] | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | Non-Hispanic | | | | | | |
| Community[3,4] | Total Minority[5] | Hispanic of Any Race | White Only | Black Only | Amer. Indian / Alaskan Native Only | Asian Only | Native Hawaiian / Pacific Islander Only | Some Other Race Only | Two or More Races[6] |
| Los Angeles County | 73.8% | 48.5% | 26.2% | 7.8% | 0.2% | 14.4% | 0.2% | 0.3% | 2.3% |
| City of Inglewood | 95.5% | 50.6% | 4.5% | 39.6% | 0.3% | 2.0% | 0.4% | 0.4% | 2.2% |
| EJ Affected Area[7] | 97.0% | 41.4% | 3.0% | 47.8% | 1.0% | 0.9% | 1.5% | 0.6% | 3.8% |
| Arbor Village | 95.4% | 52.1% | 4.6% | 33.5% | 0.2% | 0.1% | 6.4% | 0.0% | 3.0% |
| Centinela Heights[8] | 84.9% | 14.2% | 15.1% | 66.0% | 0.0% | 0.0% | 0.0% | 0.0% | 4.7% |
| Fairview Heights | 95.9% | 52.1% | 4.1% | 33.5% | 0.0% | 2.2% | 0.0% | 0.0% | 8.1% |
| Industrial[8] | 84.9% | 14.2% | 15.1% | 66.0% | 0.0% | 0.0% | 0.0% | 0.0% | 4.7% |
| Lockhaven[9] | 99.3% | 89.2% | 0.7% | 8.8% | 1.4% | 0.0% | 0.0% | 0.3% | 4.8% |
| Morningside Park | 99.6% | 5.9% | 0.4% | 87.4% | 0.0% | 1.2% | 0.0% | 0.3% | 4.8% |
| Sports Village | 97.9% | 41.8% | 2.1% | 49.4% | 1.8% | 0.8% | 0.0% | 1.0% | 3.0% |

[1] Data is from US Census Bureau, 2016-2019 ACS 5-Year Estimates
[2] People who identify their ethnic origin as Hispanic, Latino, or Spanish may be of any race.
[3] Los Angeles County and City of Inglewood data is aggregated at the census-designated place level. Data for the City of Inglewood neighborhoods is aggregated by census block groups whose geographic center (centroid) is contained by each neighborhood boundary. The neighborhood boundaries are designated by the City of Inglewood.
[4] A community is considered an EJ community if the minority population in the affected community is at least 10 percent higher than the average of the minority population in Los Angeles County. The percent of minority population for Los Angeles County is 73.8 percent; therefore, 10 percent higher is 83.8 percent.
[5] A minority is defined as an individual who identifies as any race or ethnicity except for non-Hispanic/Latino White Alone. Percent of minority population is determined using 2016-2019 ACS 5-year estimates for the census block groups that intersect both the EJ Affected Area and Affected Communities.
[6] Two or more races includes subcategories: "Two races including some other race" and "Two race excluding some other race, and three or more races".
[7] The EJ Affected Area is defined as the areas located within 0.25 mile of the Project alignment, parking facilities, MSF, and station areas and represents aggregated data from US Census Bureau block groups located within EJ Affected Area.
[8] The geographic portions of the Centinela Heights and Industrial neighborhoods located within the EJ Affected Area share the same U.S. Census Bureau block group and demographic data.
[9] Lockhaven is located on the southern edge of the EJ Affected Area and is included for a provide a conservative analysis.
**SOURCE**: US Census Bureau, 2019; TAHA, 2022

**Figure 5-1** illustrates the percent of the population identified as minority populations within the EJ Affected Area.

**Figure 5-1. Percent of the Population identified as Minority Populations in the EJ Affected Area**



# 5.2 LOW-INCOME POPULATION

## 5.2.1 CITYWIDE

As previously discussed, the HUD threshold of income limits is used to define "low-income." The 2019 median household income for Los Angeles County ($68,044) is used. A median household income approximately 73 percent of Los Angeles County ($50,000) is used as the low-income threshold. A community is considered a low-income community if the percent low-income is at least 10 percent higher than the Los Angeles County average, or the median household income is less than 73 percent of the median household income for Los Angeles County.

**Table 5-5** show the median household income and percent of low-income households for Los Angeles County, the City of Inglewood, and for each City of Inglewood-designated neighborhood. The community with a percent low-income at least 10 percent higher than the Los Angeles County average, or with a median household income less than 73 percent of Los Angeles County's median household income are the City of Inglewood and the City of Inglewood-designated neighborhoods of Arbor Village, Centinela Heights, Fairview Heights, Lockhaven, and Sports Village.

**TABLE 5-5: MEDIAN HOUSEHOLD INCOME AND PERCENT LOW-INCOME OF THE CITY OF INGLEWOOD NEIGHBORHOODS**

| Community[1] | Median Household Income[2] | Percent Low-Income[3,4] |
|---|---|---|
| Los Angeles County | $68,044 | 38.1% |
| City of Inglewood | $54,400 | 45.9% |
| Arbor Village | $57,502 | 49.0% |
| Centinela Heights | $49,499 | 49.1% |
| Century Heights | $78,651 | 30.7% |
| Fairview Heights | $52,786 | 50.1% |
| Imperial Village | $68,261 | 32.9% |
| Industrial | $70,866 | 37.7% |
| Inglewood Knolls | $69,910 | 33.6% |
| La Tijera Village | $72,822 | 31.9% |
| Lockhaven | $50,797 | 50.4% |
| Morningside Park | $76,489 | 32.6% |
| Sports Village | $48,530 | 53.1% |

[1] Los Angeles County and City of Inglewood data is aggregated at the census-designated place level. Data for the City of Inglewood neighborhoods is aggregated by census block groups whose geographic center (centroid) is contained by each neighborhood boundary. The neighborhood boundaries are designated by the City of Inglewood.
[2] Data is from US Census Bureau, 2019 ACS 5-Year Estimates Table B19001. Median Household Income in 2019 Inflation-Adjusted Dollars.
[3] Low-income is defined as households with income less than $50,000, or approximately 73% of the 2019 median household income for Los Angeles County ($68,044)
[4] Percent Low-Income is the percent of total households within an affected community with a household income of less than $50,000.
**SOURCE**: US Census Bureau, 2019; TAHA, 2022

## 5.2.2 EJ AFFECTED AREA

**Table 5-6** show the median household income and percent of low-income households of the communities in the EJ Affected Area. Communities in the EJ Affected Area with a percent low-income at least 10 percent higher than the Los Angeles County average or with a median household income less than 73 percent of Los Angeles County's median household income are Arbor Village, Fairview Heights, and Sports Village. The Industrial and Morningside Park neighborhoods have median household incomes above Los Angeles County and the City of Inglewood.

**TABLE 5-6: MEDIAN HOUSEHOLD INCOME AND PERCENT LOW-INCOME OF THE COMMUNITIES IN THE EJ AFFECTED AREA**

| Community[1] | Median Household Income[2] | Percent Low-Income[3,4] |
|---|---|---|
| Los Angeles County | $68,044 | 38.1% |
| City of Inglewood | $54,400 | 45.9% |
| EJ Affected Area[5] | $54,611 | 50.6% |
| Arbor Village | $45,040 | 54.9% |
| Centinela Heights[6] | $88,398 | 26.8% |
| Fairview Heights | $36,814 | 68.6% |
| Industrial[6] | $88,398 | 26.8% |
| Lockhaven[7] | $52,143 | 45.1% |
| Morningside Park | $82,759 | 30.0% |
| Sports Village | $51,388 | 50.7% |

[1] Los Angeles County and City of Inglewood data is aggregated at the census-designated place level. Data for the City of Inglewood neighborhoods is aggregated by census block groups whose geographic center (centroid) is contained by each neighborhood boundary. The neighborhood boundaries are designated by the City of Inglewood.

[2] Data is from US Census Bureau, 2019 ACS 5-Year Estimates Table B19001. Median Household Income in 2019 Inflation-Adjusted Dollars.

[3] Low-income is defined as households with income less than $50,000, or approximately 73% of the 2019 median household income for Los Angeles County ($68,044)

[4] Percent Low-Income is the percent of total households within an affected community with a household income of less than $50,000.

[5] The EJ Affected Area is defined as the areas located within 0.25 mile of the Project alignment, parking facilities, MSF, and station areas and data presented represents the averages of the median household income of the EJ Affected Area.

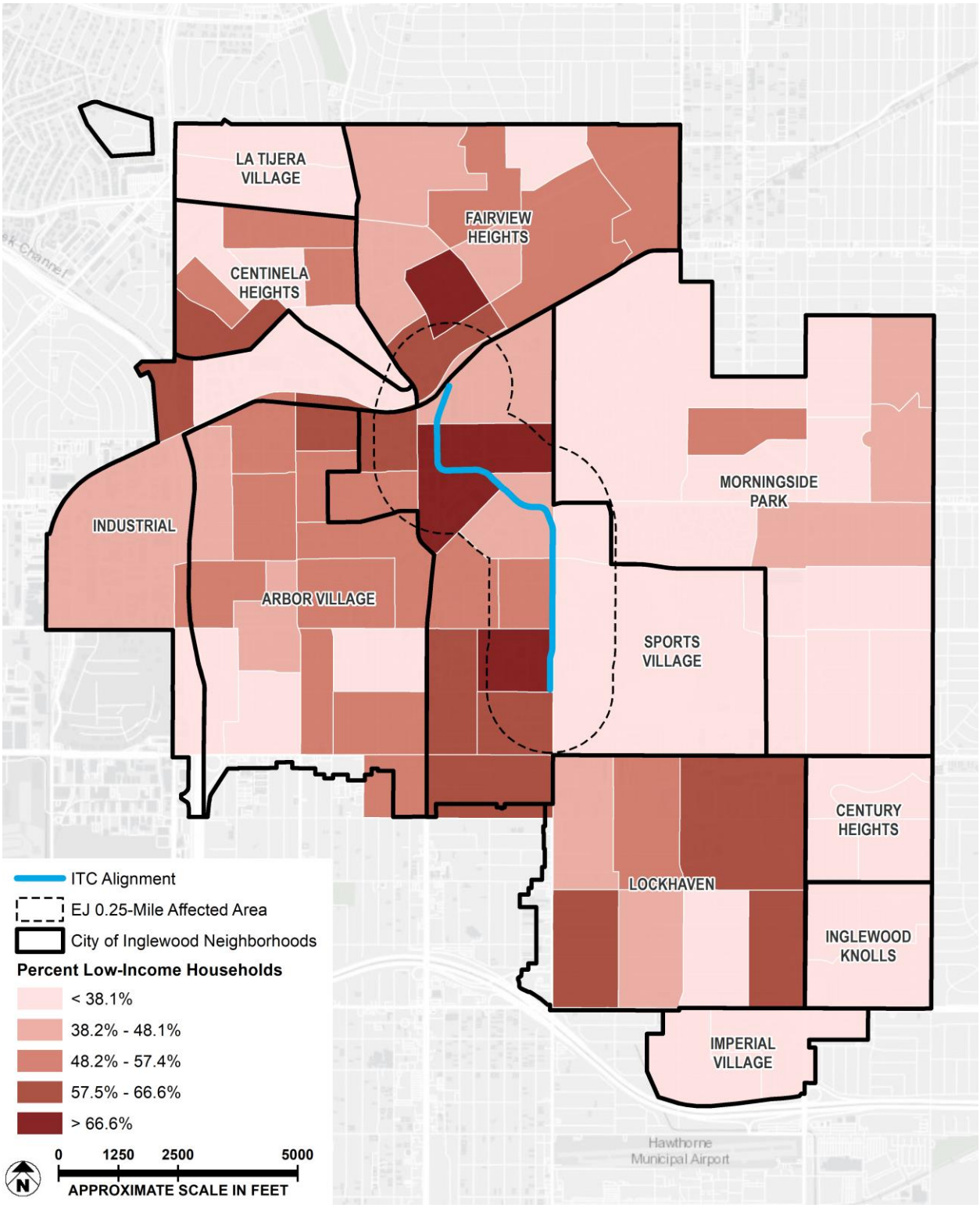
[6] The geographic portions of the Centinela Heights and Industrial neighborhoods located within the EJ Affected Area share the same U.S. Census Bureau block group and demographic data.

[7] Lockhaven is located on the southern edge of the EJ Affected Area and is included for a provide a conservative analysis

**SOURCE**: US Census Bureau, 2019; TAHA, 2022

**Figure 5-2** illustrates the percent of the population identified as low-income for the communities in the EJ Affected Area.

**Figure 5-2. Percent of the Population identified as Low Income in the EJ Affected Area**



# 5.3 ENVIRONMENTAL JUSTICE COMMUNITIES

An EJ community in an EJ analysis is often compared with the surrounding region to identify similarities, differences, and relationships between the EJ community and the region. The EJ Affected Area include the City of Inglewood-designated neighborhoods of Arbor Village, Centinela Heights Fairview Heights, Industrial, Morningside Park, Lockhaven, and Sports Village.[2] Centinela Heights and Industrial neighborhoods located within the EJ Affected Area share the same U.S. Census Bureau block group and demographic data. The northern boundary of the Lockhaven neighborhood is also considered within the EJ Affected Area to provide a conservative approach in identifying EJ communities for the analysis.

Based on the demographic and socioeconomic data provided above in Sections 5.1 and 5.2, **Table 5-7** summarizes the demographic and socioeconomic characteristics (minority population and low-income population by percent) of Los Angeles County, the City of Inglewood, and for each City of Inglewood-designated neighborhood. The minority population for each neighborhood is over 50 percent and is more than 10 percent higher than that for Los Angeles County. The neighborhoods with a household income less than 73 percent of Los Angeles County's median household income or a percent low-income population at least 10 percent greater than Los Angeles County and the City of Inglewood are Arbor Village, Centinela Heights, Fairview Heights, Lockhaven, and Sports Village.[3]

**TABLE 5-7: SUMMARY OF PERCENT MINORITY POPULATION AND PERCENT LOW-INCOME OF THE CITY OF INGLEWOOD NEIGHBORHOODS**

| Community[1,2] | Total Population | Percent Minority Population[3,4] | Median Household Income[3] | Percent Low-Income[5] |
|---|---|---|---|---|
| Los Angeles County | 10,081,570 | 73.8% | $68,044 | 38.1% |
| City of Inglewood | 109,613 | 95.5% | $54,400 | 45.9% |
| Arbor Village | 22,816 | 95.8% | $57,502 | 49.0% |
| Centinela Heights | 11,993 | 91.2% | $49,499 | 49.1% |
| Century Heights | 2,653 | 97.7% | $78,651 | 30.7% |
| Fairview Heights | 15,296 | 94.8% | $52,786 | 50.1% |
| Imperial Village | 2,097 | 93.6% | $68,261 | 32.9% |
| Industrial | 3,175 | 86.8% | $70,866 | 37.7% |
| Inglewood Knolls | 2,712 | 98.6% | $69,910 | 33.6% |
| La Tijera Village | 1,921 | 86.8% | $72,822 | 31.9% |
| Lockhaven | 15,858 | 97.4% | $50,797 | 50.4% |
| Morningside Park | 12,748 | 97.3% | $76,489 | 32.6% |
| Sports Village | 18,478 | 98.2% | $48,530 | 53.1% |

[1] Los Angeles County and City of Inglewood data is aggregated at the census-designated place level. Data for the City of Inglewood neighborhoods is aggregated by census block groups whose geographic center (centroid) is contained by each neighborhood boundary. The neighborhood boundaries are designated by the City of Inglewood.
[2] A minority is defined as an individual who identifies as any race or ethnicity except for non-Hispanic/Latino White Alone. Percent of minority population is defined using 2016-2019 ACS 5-year estimates.
[3] A community is considered an EJ community if the minority population in the affected community is at least 10 percent higher than the average of the minority population in Los Angeles County. The percent of minority population for Los Angeles County is 73.8 percent; therefore, 10 percent higher is 83.8 percent.
[4] Median Household Income in 2019 Inflation-Adjusted Dollars.
[5] Low-income is defined as households with income less than $50,000, or approximately 73% of the 2019 median household income for Los Angeles County ($68,044). (2015-2019 ACS 5-Year Estimates Table B19001).
**SOURCE**: US Census Bureau, 2019; TAHA, 2022

[2] The U.S. Census bureau block group that contains data for the Industrial neighborhood includes geographic portions of the Centinela Heights neighborhood. All census block groups whose centroid is contained by the Centinela Heights boundaries lie outside of the EJ Affected Area. Centinela Heights is not identified as a neighborhood within the EJ Affected Area.

[3] The percent of minority population for Los Angeles County is 73.8 percent; therefore, 10 percent higher is 83.8 percent. Los Angeles County's 2019 median household income is $68,044. A median household income 73 percent of Los Angeles County (approximately $50,000) is used as the low-income threshold.

**Table 5-8** provides a summary of the demographic and socioeconomic characteristics (minority population and low-income population by percent) of the identified communities in the EJ Affected Area. Each neighborhood in the EJ Affected Area has a minority population of over 50 percent and is more than 10 percent higher than that for Los Angeles County. The neighborhoods with a household income less than 73 percent of Los Angeles County's median household income or a percent low-income population at least 10 percent greater than Los Angeles County are Arbor Village, Fairview Heights, and Sports Village.[4]

**TABLE 5-8: SUMMARY OF PERCENT MINORITY POPULATION AND PERCENT LOW-INCOME OF THE EJ AFFECTED AREA**

| Community[1] | Percent Minority Population [2,3] | Median Household Income[4] | Percent Low-Income[5,6] |
|---|---|---|---|
| Los Angeles County | 73.8% | $68,044 | 38.1% |
| City of Inglewood | 95.5% | $54,400 | 45.9% |
| EJ Affected Area[7] | 97.0% | $54,611 | 50.6% |
| Arbor Village | 95.4% | $45,040 | 54.9% |
| Centinela Heights[8] | 84.9% | $88,398 | 26.8% |
| Fairview Heights | 95.9% | $36,814 | 68.6% |
| Industrial[8] | 84.9% | $88,398 | 26.8% |
| Lockhaven[9] | 99.3% | $52,143 | 45.1% |
| Morningside Park | 99.6% | $82,759 | 30.0% |
| Sports Village | 97.9% | $51,388 | 50.7% |

[1] Los Angeles County and City of Inglewood data is aggregated at the census-designated place level. Data for the City of Inglewood neighborhoods is aggregated by census block groups whose geographic center (centroid) is contained by each neighborhood boundary. The neighborhood boundaries are designated by the City of Inglewood.

[2] A minority is defined as an individual who identifies as any race or ethnicity except for non-Hispanic/Latino White Alone. Percent of minority population is defined using 2016-2019 ACS 5-year estimates.

[3] A community is considered an EJ community if the minority population in the affected community is at least 10 percent higher than the average of the minority population in Los Angeles County. The percent of minority population for Los Angeles County is 73.8 percent; therefore, 10 percent higher is 83.8 percent.

[4] Median Household Income in 2019 Inflation-Adjusted Dollars.

[5] Low-income is defined as households with income less than $50,000, or approximately 73% of the 2019 median household income for Los Angeles County ($68,044). (2019 ACS 5-Year Estimates Table B19001)

[6] Percent Low-Income is the percent of total households within an affected community with a household income of less than $50,000.

[7] The EJ Affected Area is defined as the areas located within 0.25 mile of the Project alignment, parking facilities, MSF, and station areas and data presented represents the averages of the median household income of the EJ Affected Area. Values for the City of Inglewood neighborhoods average the median household income of all aggregated EJ Affected Area census block groups whose geographic center (centroid) is contained by each neighborhood boundary.

[8] The geographic portions of the Centinela Heights and Industrial neighborhoods located within the EJ Affected Area share the same U.S. Census Bureau block group and demographic data.

[9] Lockhaven is located on the southern edge of the EJ Affected Area and is included for a provide a conservative analysis

**SOURCE**: US Census Bureau, 2019; TAHA, 2022

Based on the CEQ Environmental Justice Guidance under the NEPA EJ community criteria discussed in Section 43 and data summarized in **Table 5-7** and **Table 5-8**, the City of Inglewood-designated neighborhoods of Arbor Village, Centinela Heights, Fairview Heights, Industrial, Lockhaven, Morningside Park, and Sports Village located in the EJ Affected Area are considered EJ communities. No non-EJ communities are identified within the EJ Affected Area. The following describes the socioeconomic characteristics of Los Angeles County, the City of Inglewood, and each EJ community identified in the EJ Affected Area.

**Los Angeles County**. Los Angeles County encompasses an area of approximately 4,083 square miles with a population of 10,081,570 residents. Los Angeles County has a wide variety of land uses including large tracts

[4] The percent of minority population for Los Angeles County is 73.8 percent; therefore, 10 percent higher is 83.8 percent. Los Angeles County's median household income is $56,196. A median household income 73 percent of Los Angeles County (approximately $50,000) is used as the low-income threshold.

of open space, residential communities, institutional/public facilities, major utilities infrastructure, commercial, industrial, and recreational uses. The population of Los Angeles County is 73.8 percent minority, and approximately 38.1 percent of the population is considered low-income.

**City of Inglewood.** The City has a population of approximately 109,600 residents. With an area of approximately 9.1 square miles, the community's population density is approximately 12,045 residents per square mile. Land uses in the City consist of a mix of residential (46.7 percent), right-of-way (23.5 percent), public/semi-public (20.3 percent), commercial (6.1 percent) and industrial (3.7 percent) uses. The Project alignment is adjacent to a mixture of commercial, residential, and mixed-use land uses. The population is 95.5 percent minority, and approximately 45.9 percent of population is considered low-income. The percent of minority population for the City of Inglewood is 21.7 percent greater than that of Los Angeles County.

**Arbor Village**. The neighborhood of Arbor Village is located in the western half of the City, sharing a western boundary with the neighborhood of Imperial Village. Arbor Village has a population of approximately 22,816 residents within 1.2 miles, or approximately 18,839 residents per square mile. Arbor Village has a 95.8 percent minority population and 49.0 percent is considered low-income. Arbor Village is characterized by large tracts of residential land uses (comprising 88.2 percent of land uses in the neighborhood), public institutions like Inglewood High School, and recreational facilities like the Sentinel Village. Within the EJ Affected Area, commercial land uses are dominant. The Arbor Village community within the EJ Affected Area has a 95.4 percent minority population and 54.9 percent of the population is considered low-income. Therefore, the Arbor Village community and population in the EJ Affected Area meets the criteria to be considered an EJ community.

**Centinela Heights.** The neighborhood of Centinela Heights is located northwest of the proposed Market Street/Florence Avenue Station, sharing an eastern border with the Fairview Heights neighborhood. Centinela Heights has a population of 2,653 residents within a 0.25 square mile area. The population is characterized as 91.2 percent minority and 30.7 percent is considered low-income. Residential land uses dominate the total neighborhood area (96.1 percent), with 2.5 percent of land uses dedicated to commercial uses. The portion of Centinela Heights located within the EJ Affected Area is predominantly characterized by commercial uses anchored along La Brea Avenue. The Centinela Heights community within the EJ Affected Area has an 84.9 percent minority population and 26.8 percent is considered low-income. Therefore, the Centinela Heights community and population in the EJ Affected Area meets the criteria to be considered an EJ community.

**Fairview Heights**. The neighborhood of Fairview Heights is located north of the proposed Market Street/Florence Avenue Station. Fairview Heights has a population of approximately 15,296 residents within a 1 square mile area. The neighborhood is predominantly comprised of residential land uses (79.5 percent) and contains Edward Vincent Jr Park as a major recreational area. The population of Fairview Heights as a whole is 94.8 percent minority and 50.1 percent is considered low-income. The portion of Fairview Heights within the EJ Affected Area is characterized by commercial and institutional uses anchored along Florence Avenue. The Fairview Heights community within the EJ Affected Area has a 95.9 percent minority population and 68.6 percent of the population is considered low-income. Therefore, the Fairview Heights community and population in the EJ Affected Area meets the criteria to be considered an EJ community.

**Industrial**. Industrial is a western neighborhood of the City characterized predominantly by industrial land uses. The neighborhood has a population of approximately 3,175 residents within a 0.7 square mile area. The population of Industrial as a whole is 86.8 percent minority and 37.7 percent is considered low-income. The Industrial community within the EJ Affected Area has a 84.9 percent minority population and 26.8 percent of the population is considered low-income. Therefore, the Industrial community and population in the EJ Affected Area meets the criteria to be considered an EJ community.

**Lockhaven.** The neighborhood of Lockhaven is located southwest of the proposed Prairie Avenue/Hardy Street Station, sharing a northern border with the Sports Village neighborhood. Lockhaven has a population

of 215,858 residents within a 1.06 square mile area. The population is characterized as 97.4 percent minority and 50.4 percent is considered low-income. The neighborhood contains a mix of land uses including residential (64.4 percent), commercial (14.6 percent), and institutional and public facilities (14.5 percent). The portion of Lockhaven located within the EJ Affected Area is predominantly characterized by commercial uses and vacant land anchored along Century Boulevard and residential uses further south. The Lockhaven community within the EJ Affected Area has a 99.3 percent minority population and 45.1 percent is considered low-income. Therefore, the Lockhaven community and population in the EJ Affected Area meets the criteria to be considered an EJ community.

**Morningside Park**. Morningside Park is in the eastern side of the City with a population of approximately 12,748 persons, within a 1.95 square mile area, or approximately 6,528 residents per square mile. Major land uses within the neighborhood include the open space facility of Inglewood Cemetery, which is located within the EJ Affected Area, large tracts of single-family housing, multifamily housing and public housing developments. The population of Morningside Park as a whole is 97.3 percent minority and 32.6 percent is considered low-income. The Morningside Park community within the EJ Affected Area has a 99.6 percent minority population and 30 percent of the population is considered low-income. Therefore, the Morningside Park community and population in the EJ Affected Area meets the criteria to be considered an EJ community.

**Sports Village**. The Sports Village neighborhood includes major entertainment venues, including the Forum and the SoFi Sports Stadium, and residential uses west of Prairie Avenue. The proposed Prairie Avenue/Manchester Boulevard and Prairie Avenue/Hardy Street stations would be located in the Sports Village neighborhood. Approximately 18,487 residents live within the 1.73 square miles neighborhood, or approximately 10,668 residents per square mile. The population of Sports Village as a whole is 98.2 percent minority and 53.1 percent is considered low income. The Sports Village community within the EJ Affected Area has a 97.9 percent minority population and 50.7 percent of the population is considered low-income. Therefore, the Sports Village community and population in the EJ Affected Area meets the criteria to be considered an EJ community.

## 5.4 DISTRIBUTION OF MINORITY AND LOW-INCOME POPULATIONS

The EJ population concentration is distributed differently throughout the corridor. **Figure 5-3** shows distribution of the minority and low-income populations within the EJ Affected Area. The highest percentage of population identified as minority or low-income is Sports Village, which the proposed alignment is located, followed by Arbor Village. The lower concentrated EJ population is in Centinela Heights, Industrial, Lockhaven, Morningside Park, and Fairview Heights. **Figure 5-4** and **Figure 5-5** show the spatial distribution of the populations identified as a minority and low-income in the EJ Affected Area.

**Figure 5-3. EJ Population Concentration in the EJ Affected Area**

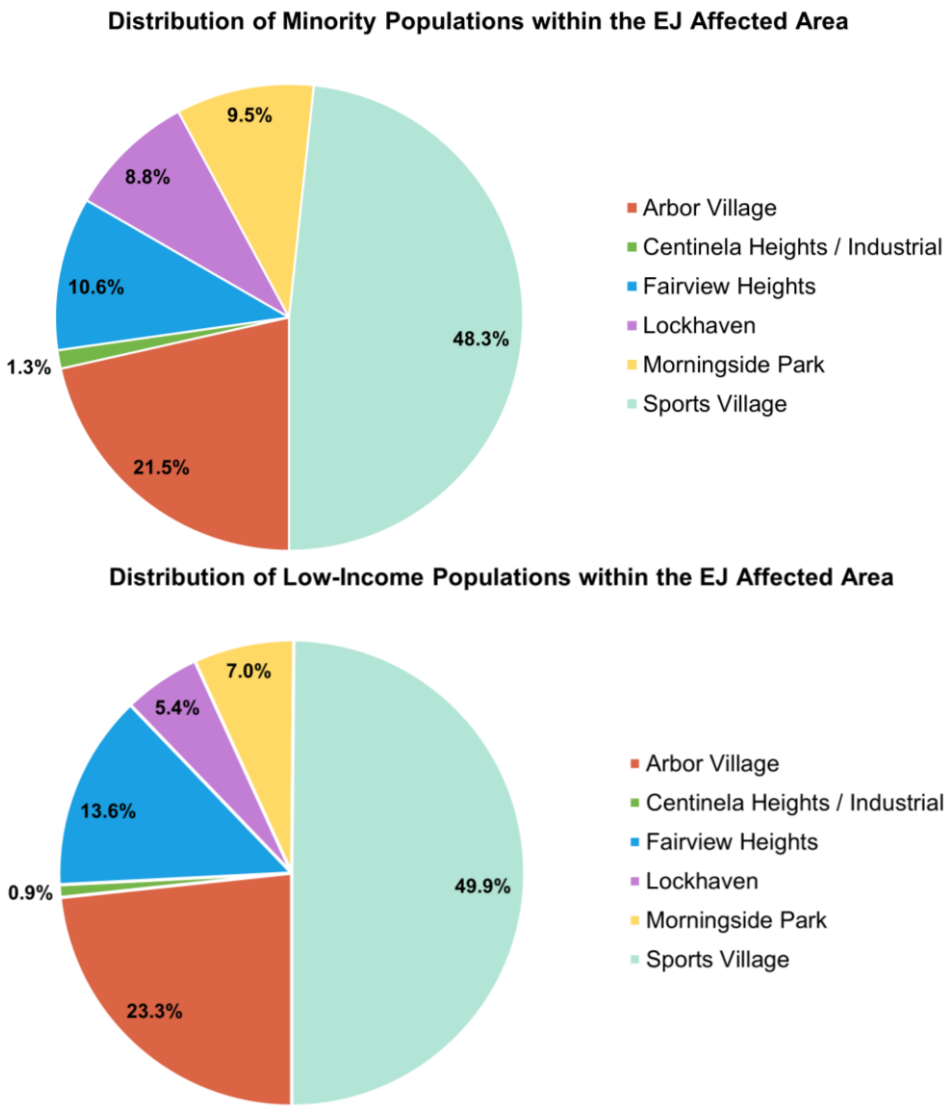


**Figure 5-4. Minority Population Concentration in the EJ Affected Area**

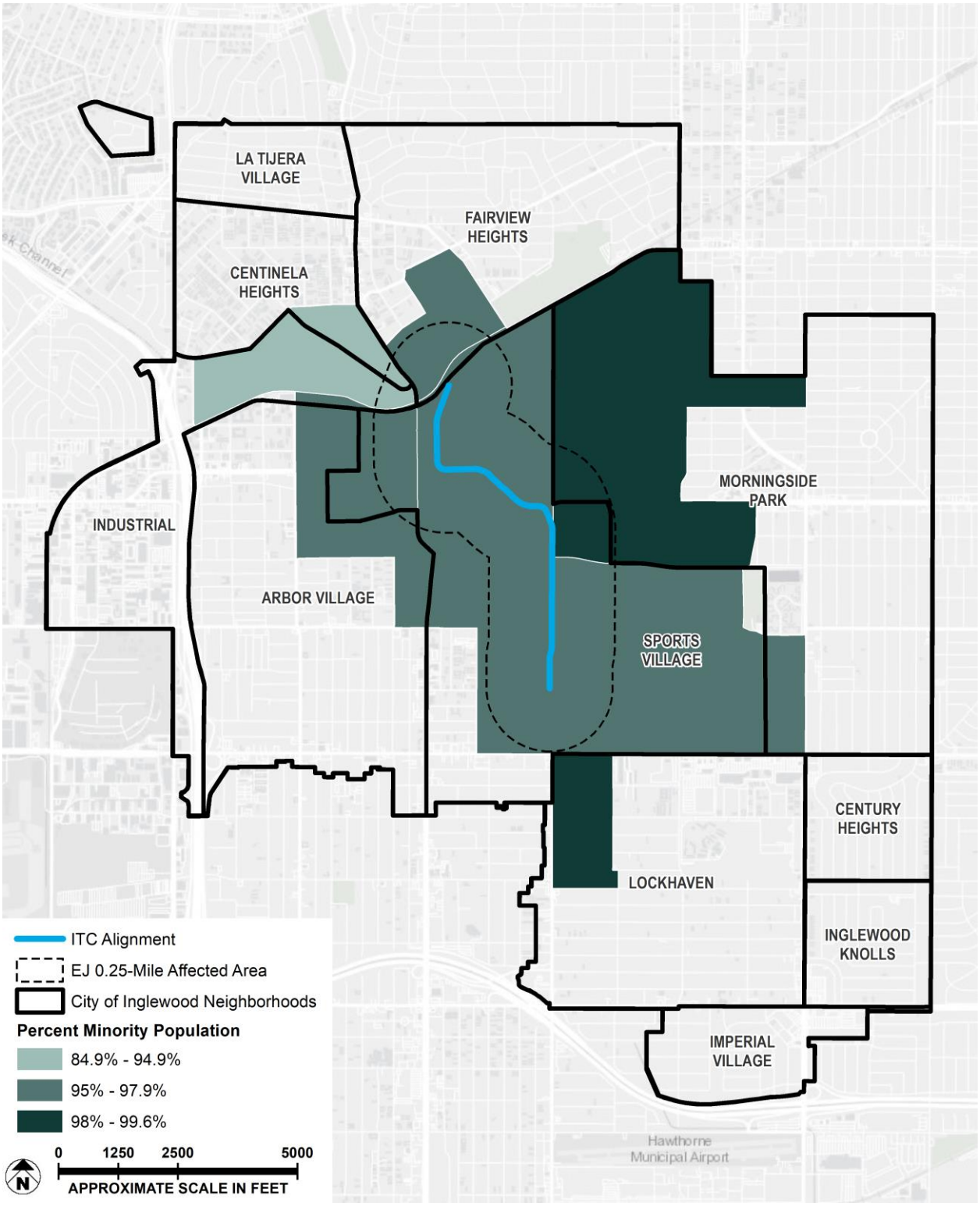
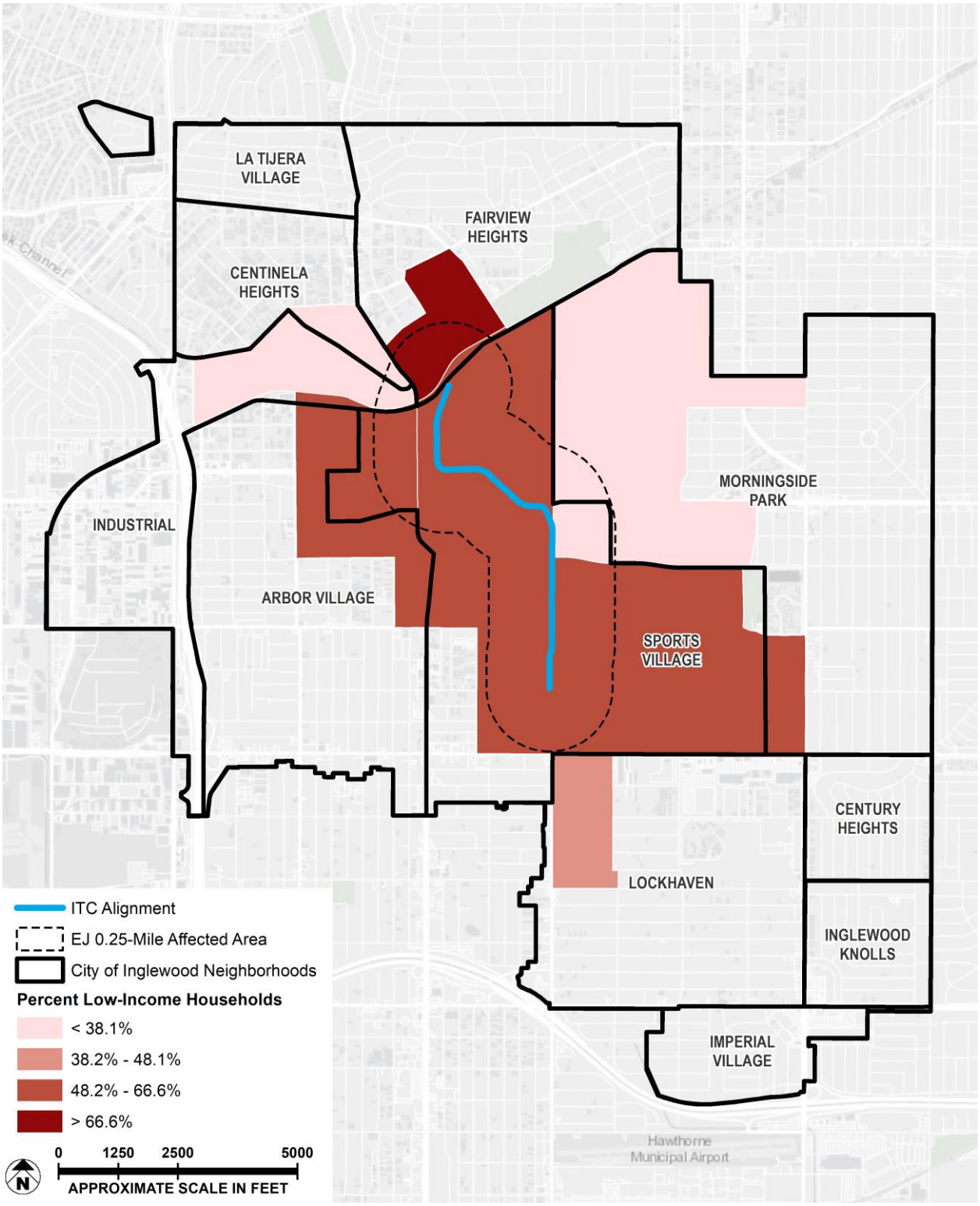


**Figure 5-5. Low-Income Population Concentration in the EJ Affected Area**



# 6.0 ENVIRONMENTAL CONSEQUENCES

## 6.1 NO BUILD ALTERNATIVE

The No Build Alternative provides the background transportation network, against which the Build Alternatives' impacts are identified and evaluated under NEPA. The No Build Alternative does not include the proposed Project. Specifically, the No Build Alternative reflects the reasonably foreseeable transportation network in 2027 and 2045 and includes the existing transportation network and planned transportation improvements that have been committed to and identified in the constrained Metro Long Range Transportation Plan and the Southern California Association of Government (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), as well as additional projects funded by Measure M, a sales tax initiative in Los Angeles County approved by voters in November 2016. Section 2.1 further describes the No Build Alternative.

The No Build Alternative would avoid all project-related impacts to environmental resources. However, the No Build Alternative would not fully meet the Project purpose and need such as improved transit connections, reduction in traffic congestion, and access. The No Build Alternative would not provide the positive benefits of increased mobility and connectivity between the Metro regional transit system and the City of Inglewood. Therefore, no adverse effects on EJ communities would occur, and a disproportionately high and adverse effect would not occur in the EJ communities in the EJ Affected Area.

## 6.2 BUILD ALTERNATIVE

This analysis focuses on the immediate adverse effects to the EJ population located within the EJ Affected Area (0.25 mile of the alignments, parking facilities, MSF site options, and station areas). The NEPA EA identified several resources of no concern (archaeological and paleontological resources during operations, coastal zones, ecologically sensitive areas, floodplains, geology, land use, Section 6(f) resources, water quality and hydrology, wetlands and navigable waterways, and wild and scenic rivers) and did not require full analysis in the NEPA EA. The NEPA EA also determined that several resources would result in no adverse effects (transportation and traffic during operations; air quality during operations; community and socioeconomic effects during operations; migratory birds during operation; economic and fiscal impacts; energy resources during construction; greenhouse gas emissions (GHG); hazardous materials during operation; land acquisition and displacements; land use; and safety/security during operation. Therefore, these environmental topics would not result in a disproportionately high and adverse effect to EJ communities and are not further discussed. The environmental effect for each topic is summarized below:

- **Transportation and Traffic (Operations):**
    - **Transit Services:** The proposed Project would reduce regional vehicle miles travel (VMT) and provide a convenient transit connection from the Metro K Line to entertainment venues. Project operations are designed to accommodate peak demand for small, medium, and large events at the entertainment venues. These improvements would be a beneficial effect of the proposed Project.
    - **Vehicular Traffic:** The proposed Project daily traffic volumes are projected to decrease along key corridors including Prairie Avenue, Manchester Boulevard and Century Boulevard within the study area, thereby improving traffic flows. In 2027 with an entertainment event, daily traffic volumes would decrease along key corridors ranging between approximately 1,550 to 2,160 vehicle trips per day along Prairie Avenue between Manchester Boulevard and Century

Boulevard; approximately 840 to 1,210 vehicle trips per day along Manchester Boulevard between La Brea Avenue and Crenshaw Boulevard; and approximately 1,120 to 1,640 vehicle trips per day along Century Boulevard between La Brea Avenue and Crenshaw Boulevard. Weekday 2027 average daily trips (ADT) would also decrease from the No Build alternative, albeit to a lesser extent than shown above for event days. In 2045 with an entertainment event, daily traffic volumes would decrease along key corridors ranging between approximately 1,710 to 2,470 vehicles per day along Prairie Avenue between Manchester Boulevard and Century Boulevard; approximately 980 to 1,410 vehicles per day along Manchester Boulevard between La Brea Avenue and Crenshaw Boulevard; and approximately 1,390 to 1,870 vehicles per day along Century Boulevard between La Brea Avenue and Crenshaw Boulevard. Weekday 2045 ADT would also decrease from the No Build alternative, albeit to a lesser extent than shown above for event days. Overall, the analyzed corridors would experience less congestion on a system-wide basis, particularly during the peak periods, with implementation of the proposed Project. These improvements would be a beneficial effect of the proposed Project.

- **Parking:** The proposed Project includes parking lots at the Market Street/Florence Avenue Station (650 public parking spaces), 150 S. Market Street (50 public parking spaces), and the Prairie Avenue/Hardy Street Station (80 public parking spaces). These parking lots would supplement the No Build Alternative parking conditions and the additional parking is a beneficial effect of the proposed Project.

- **Pedestrian and Bicycle Activities:** The proposed Project would accommodate all users and would include pedestrian access improvements and upgrades to the existing sidewalks along the transit corridor consistent with the American Disability Act (ADA). Separation of pedestrians from the roadway using the recommended street trees per the Design Standards and Guidelines would be incorporated to maintain the character of the historic core along Market Street. Regarding bicycle facilities, the streetscape improvements would facilitate active transportation through wider sidewalks and increase street safety markings. These improvements, primarily related to pedestrian facilities, would be a beneficial effect of the proposed Project.

- **Air Quality (Operations):**

  - **Regional Conformity:** The proposed Project is included in SCAG *2021 Federal Transportation Improvement Program* (FTIP), adopted by SCAG on March 4, 2021, and in 2021 FTIP Amendment 21-05 approved by FTA/Federal Highway Administration on January 4, 2022. The 2017 FTIP Identification Number is LA99ITC101. The regional conformity determination requirement is satisfied.

    **Project-Level Conformity: *Particulate Matter (PM) Hot-Spots*.** The proposed Project is within a nonattainment area for the federal $PM_{2.5}$ National Ambient Air Quality Standards (NAAQS) and maintenance area for the $PM_{10}$ NAAQS. SCAG's Transportation Conformity Working Group determined on December 7, 2021, that the proposed Project is not considered to be a Project of Air Quality Concern and a quantitative hot-spot analysis is not required. Therefore, no adverse effects related to worsening existing or contributing to new localized PM hot spots would occur. The PM hot-spot requirement is satisfied.

    ***Carbon Monoxide (CO) Hot-Spots*.** The proposed Project would reduce vehicle volumes on all analyzed segments. There would be no potential for the proposed Project to generate a new CO hot-spot or worsen an existing CO hot-spot. The CO hot-spot requirement is satisfied.

  - **Criteria Pollutant, Ozone Precursor, and Mobile Source Air Toxic (MSAT) Emissions:** The proposed Project would generate new stationary and area source emissions; however, these emissions would be offset by decreased mobile source emissions. The proposed Project would result in an annual VMT reductions with and without special events. Daily operational emissions

associated with the proposed Project would result in net negative emissions. Therefore, the proposed Project would result in a beneficial effect related to criteria pollutant emissions.

Reductions in VMT would lead to reductions in project vicinity MSAT emissions. Based on current Environmental Protection Agency (EPA) regulations, an analysis of national trends with EPA's MOVES model forecasts a combined reduction of over 80 percent in the total annual emission rate for the priority MSAT from 2010 to 2050 while during this same time VMT are projected to increase by over 100 percent. This will further reduce the background level of MSAT. Therefore, the proposed Project would result in a beneficial effect related to MSAT emissions.

- **Archaeological And Paleontological Resources (Operations):** The potential to disturb archaeological and paleontological resources is only possible during ground disturbance associated with construction activities. There is no potential for the ATS operational activities to encounter archaeological or paleontological resources. Therefore, operational activities would not result in an adverse effect related to archaeological or paleontological resources.

- **Community and Socioeconomic Effects (Operations):** The proposed Project would be elevated to minimize access impacts to adjacent land uses and ground transportation. Stations would be designed to provide easy access for pedestrians to and from the station and adjacent streets. The proposed MSF and stations would be constructed on private property requiring acquisition and displacement of several businesses. While the guideway and support columns would change the physical characteristics of Market Street, the elevated ATS Guideway would not introduce features that would physically divide the community. No community facilities would be acquired and access to community facilities would be improved or enhanced by reconstruction associated with the proposed Project. Therefore, operational activities would not result in an adverse effect to community cohesion.

- **Economic and Fiscal Impacts (Construction and Operations):** The proposed Project would lead to increased foot traffic around the stations thereby supporting economic development opportunities and increasing mobility and access in the area by providing a transit benefit. The increase in visitors that would be generated by the proposed Project is expected to represent a wider cross section of the region, which would potentially diversify Downtown's current visitor base. Therefore, operational activities would not result in an adverse effect related to business activity.

- **Ecosystems/Biological Resources (Construction and Operations):**

    - **Coastal Zones:** The proposed Project is not located within a defined Coastal Zone. Therefore, neither construction nor operational activities would result in an adverse effect related to coastal zones.

    - **Ecologically Sensitive Areas:** The proposed Project is located entirely within a highly developed urban area. No native habitat is present; no biological resources are considered ecologically sensitive; and no wildlife corridors to support the movement of wildlife species other than birds are present. The proposed Project is not located within a significant ecological area as defined in the County of Los Angeles General Plan; does not occur within a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan; and no forest resources, wildlife, fisheries, shorelines, or agricultural land are present within the City. Therefore, neither construction nor operational activities would result in an adverse effect related to ecologically sensitive areas.

    - **Migratory Birds (Operation):** Operation of the guideway and stations would not substantially interfere with migratory or nesting bird nests once built as the majority of the proposed Project components would remain stationary with exception of the ATS train cars. Vegetation

maintenance and abatement would be performed, as needed, for City street trees and landscaping along the proposed alignment and on the station and MSF sites. Therefore, operational activities would not result in an adverse effect related to ecosystems or biological resources.

- **Wetlands and Navigable Waterways:** The proposed Project is not in proximity to, nor does it contain, wetland habitat or a blue-line stream that is subject to the jurisdiction of the United States Army Corps of Engineers or the California Department of Fish and Wildlife. Therefore, neither construction nor operational activities would result in an adverse effect related to federally protected wetlands (i.e., marsh, vernal pool, coastal, etc.) or navigable waterways.
- **Wild and Scenic Rivers:** No wild or scenic rivers are identified near the proposed Project. Therefore, neither construction nor operational activities would result in an adverse effect related to wild and scenic rivers.

- **Energy Resources (Construction and Operation; natural gas, petroleum and direct energy consumption):** The proposed Project would indirectly affect energy use by increasing regional transit thereby reducing VMT and associated fuel use. Regarding natural gas, the MSF and stations would use approximately 2,340,800 thousand British Thermal Units (kBTU) of natural gas per year compared to the existing use of approximately 6,902,525 kBTU of natural gas per year. The proposed Project would include up to two stationary standby diesel generators with an estimated annual fuel usage 27,440 gallons of diesel fuel per year. The VMT reduction due to the proposed Project would result in energy savings, which would offset the increase in energy use associated with operation of the ATS, associated stations and the MSF. Therefore, the proposed Project would not result in an adverse effect related to direct energy consumption.

  The proposed Project would consume a total of 163,734,871 gallons of petroleum during the morning/evening shift construction scenario, and 151,002,831 gallons of petroleum during the morning/night shift construction scenario. In addition, construction activities would require 165,115 kilowatt-hours of electricity. The increased fuel use and electricity consumption is not considered a wasteful or inefficient use of non-renewable resources as the fuel is being used to construct a mass transit system, which has been identified by FTA as an efficient method of reducing energy use. Therefore, construction activities would not result in an adverse effect related to energy.

- **Floodplains (Construction and Operations):** Based on the Federal Emergency Management Agency Flood Insurance Rate Map (FIRM 06037C1780G), the proposed Project would not be located within a delineated 100-year floodplain. The proposed Project is outside of the floodplain of any nearby flood control channel (Centinela Creek and Dominguez Channel). Structures constructed as part of the proposed Project would not have the potential to redirect flows within a flood zone from a 100-year storm event. Therefore, neither construction nor operational activities would result in an adverse effect related to floodplains.

- **Geology (Operations):** Operational activities would not result in an adverse effect related to geology.

- **Greenhouse Gas Emissions (Construction and Operations):** The proposed Project would generate operational emissions from mobile, area, and energy sources, in addition to solid waste decomposition, energy associated with water conveyance, and energy associated with wastewater disposal. Indirect emissions from solid waste, water, and wastewater would be generated at the MSF. The proposed Project would result in a net reduction of 73,898 metric tons of carbon dioxide equivalent ($MTCO_2e$) annually in 2027 and a net reduction of 74,038 $MTCO_2e$ annually in 2045. Therefore, the proposed Project would result in a beneficial effect related to GHG emissions and would not result in an adverse effect related to climate change.

Construction would result in the short-term generation of GHG emissions from combustion exhaust and would result in 8,820 metric tons of GHG emissions. The GHG analysis follows local guidance recommended by the South Coast Air Quality Management District (SCAQMD), which suggests amortizing construction emissions over the "typical project" useful life span of 30 years and assessing construction emissions together with operational emissions. Therefore, construction activities would not result in an adverse effect related to GHG emissions.

- **Hazardous Materials (Operations):** A Hazardous Materials Business Plan would be prepared for the proposed Project for facilities using and storing hazardous materials above regulatory threshold quantities. Hazardous Materials Business Plans 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. Transport of hazardous materials would be regulated by the USDOT and Caltrans, which together determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release. Therefore, operational activities would not result in an adverse effect related to hazardous materials.

- **Historical Resources (Operations):** The proposed Project would only result in direct impacts to The Forum due to required relocation of traffic lanes, construction of new sidewalk along the east side of Prairie Avenue, straddle bent support columns, and the proposed pedestrian bridge from the Manchester Boulevard/Prairie Avenue Station. However, the proposed Project would not alter the relationship between the Forum building and its immediate surroundings in any meaningful way. The important aspects of the Forum's historical setting would remain intact. Because the proposed Project would not physically alter the Forum building; would not block or obscure important views of the Forum building; and would only alter a small portion of the Forum parking lot; the Project would not result in a substantial adverse change in the significance of the historical resource and effects on The Forum would not be adverse.

  Indirect effects may materially impair and adversely affect the significance of a historical resource if the historical resource can no longer convey its historical significance and justify its inclusion in a register. With regard to the Inglewood Park Cemetery and Holy Faith Episcopal Church, it has been determined that no effects to either resource would result from the Build Alternative as the setting of both historical resources includes features within its boundaries as well as its immediate surroundings rather than these resources' relationship to surrounding development. In addition, the ATS guideway and support structure would not physically alter former United Bank of California building, former Bank of Inglewood building, former J.C. Penney building, the Professional Building, and the Bank of America building in any way and the buildings would remain in their original locations, retaining all their significant character-defining features and materials. Impacts to each of these resources would not be adverse.

- **Land Acquisition and Displacements (Construction and Operation):** The proposed Project would require full and partial acquisitions that would only affect commercial and industrial areas and not residential properties. The City would provide relocation assistance and compensation for all displaced businesses as required under the Uniform Act and California Relocation Act. Therefore, neither construction and operational activities would not result in an adverse effect related to business and employee displacements.

- **Land Use (Construction and Operation):** The proposed Project would be consistent with applicable plans, policies, and regulations. The proposed Project would further the goals and objectives of the existing plans and policies and would not obstruct the attainment of the existing policies, plans, and programs. Therefore, operational activities would not result in an adverse effect related to land use.

Construction activities would generally occur within the public right-of-way and adjacent properties and would be consistent with all applicable City regulations and guidelines, and the additional construction management and community support actions identified in the ITC Construction Commitment Program. Construction effects would be temporary and would not affect permanent changes that would alter or compromise existing plans, policies, or regulations. Therefore, construction activities would not result in an adverse effect related to land use or zoning.

- **Vibration (Operation):** The condition of the rails, type of guideway construction, other proposed Project components, and the mass and stiffness of the guideway structure would have an influence on the level of groundborne vibration. It is rare for groundborne vibration to be a problem with elevated railways except when guideway supports are located within 50 feet of buildings. The buildings nearest to the guideway include commercial and residential uses along Market Street, Manchester Boulevard and Prairie Avenue which would be approximately 30 feet from the guideway centerline. The estimated groundborne vibration levels at these locations would be approximately 67 VdB for monorail ATS and 64 VdB for the rubber-tired ATS. Both levels are well below the criteria for potential damage, which is 90 VdB for buildings extremely susceptible to vibration damage. The maximum predicted vibration levels of approximately 67 VdB for monorail ATS and 64 VdB for the rubber-tired ATS at the closest residences, would be below the FTA criterion of 72 VdB for annoyance. Therefore, no adverse effect related to land vibration would occur.

- **Safety/Security (Operations):** The proposed Project's safety and security programs and operations would be required to adhere to all State and local safety requirements including those of the Inglewood Police Department (IPD) and LA County Fire Department (LACFD). The IPD and LACFD would serve the proposed Project, security measures and safety lighting would be implemented. Accessibility at the stations and vehicles would be designed to be fully compliant with the ADA and associated regulations and guidance. Therefore, operational activities would not result in an adverse effect related to safety and security.

- **Section 4(f) Resources (Construction and Operations):** The proposed Project would not result in the use of identified Section 4(f) Resources. The proposed Project would result in a *de minimis* impact to The Forum as a result of the direct use of approximately 0.7 acre of property and alterations to the parking lot. The Forum would retain its essential character and the proposed Project would not physically alter The Forum building or result in substantial adverse change to the historical significance of The Forum.

- **Section 6(f) Resources (Construction and Operations):** Section 6(f) does not apply as no parks or recreational properties funded through the Land and Water Conservation Fund would be acquired or improved.

- **Water Quality and Hydrology (Construction and Operations):** The proposed Project may require the relocation, reconfiguration, or new installation of storm drains. Alterations to the storm drainage system would not change the existing drainage patterns of the area. The proposed Project would comply with the City's and County's Municipal Separate Storm Sewer System (MS4) Permit and project-specific Stormwater Management Plan (SWMP) or Standard Urban Stormwater Mitigation Plan (SUSMP). The proposed Project is not near streams or rivers. Therefore, operational activities would not result in an adverse effect related to water quality and hydrology.

  Construction activities may expose and temporarily disturb soils, potentially resulting in erosion and adversely affecting water quality. Construction activities would comply with a National Pollutant Discharge Elimination System (NPDES) Construction Activities Stormwater General Permit (CGP) from the Los Angeles Regional Water Quality Control Board. This permit requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that incorporates best management practices (BMPs) for erosion control in addition to BMPs to minimize the potential for

spills of toxic or hazardous chemicals or substances into surface or groundwaters. Therefore, the proposed Project would not result in an adverse effect related to water quality and hydrology.

This EJ analysis focuses on whether construction of the Build Alternative would result in disproportionately high and adverse effects to the higher concentrations of EJ populations identified within the EJ Affected Area (i.e., Sports Village and Arbor Village). A majority of the adverse effects would immediately occur within the Sports Village neighborhood as the alignment would primarily traverse along Market Street, Manchester Boulevard, and Prairie Avenue, which are within the Sports Village neighborhood. As previously discussed, the EJ Affected Area contains all EJ communities with EJ populations. As such, the environmental effects of the Build Alternative would be predominantly borne by EJ communities. However, as further discussed below, these types of environmental effects occur across the Metro system corridor and similar effects occur in EJ communities and non-EJ communities. Measures to minimize would be implemented with similar type and quality throughout the EJ Affected Area.

For further comparison, a review was undertaken for light rail projects constructed and operated in Los Angeles County. This review of the Metro LRT system identified several LRT systems comparable to the proposed Project based on similar technologies, alignment types, and service areas. These include the Metro E Line, L Line, and C Line. These LRT systems are adjacent to communities that contain both EJ and non-EJ populations. Based on an analysis of current census data, the non-EJ populations along these LRT systems include:

- Metro E Line: Santa Monica, West Los Angeles, Rancho Park, Century City, Cheviot Hills, Beverlywood, Pico-Robertson
- Metro L Line: Elysian Park, Pasadena
- Metro C Line: El Segundo, Manhattan Beach, Hawthorne, Redondo Beach

Non-EJ communities experienced environmental effects for construction and operations similar to those identified for the EJ communities in the EJ Affected Area of the Build Alternative. Across the Metro projects, adverse effects and measures to minimize harm in these non-EJ communities were addressed in a similar manner as EJ communities. Metro has implemented each LRT system guided by established design guidelines as well as through the requirements of project-specific environmental documents. The review indicates that measures to minimize for the Build Alternative would be implemented throughout the EJ Affected Area with similar type and quality as other Metro projects.

### 6.2.1 AESTHETIC AND VISUAL QUALITY

#### Summary of Effects

**Not Adverse with Avoidance Measure**. New vertical features such as proposed stations, ATS guideway, and MSF would be introduced to the area of visual effect (AVE) and would be visible and noticeable to all viewers within the AVE given the height, mass, and prominent location of facilities within and adjacent to public street right-of-way. The AVE consists of a mostly commercial corridor with limited visual resources and vertical features and while noticeable, would not obstruct or otherwise diminish views for most viewers.

Residential viewers within the AVE are located within the Manchester Boulevard segment in neighborhoods north of Manchester Boulevard, between Hillcrest Drive and Prairie Avenue. The guideway would be elevated above the windows of the homes facing Manchester Boulevard; however, the elevation of these homes reduces the degree to which the guideway presents a dominating mass affecting views from these homes. There are no scenic vistas or visual resources available to the homes facing Manchester Boulevard such that the guideway would obstruct views. The MSF would also be visible to residences south of Manchester Boulevard between Hillcrest Drive and Tamarack Avenue. The proposed elevated MSF and support columns for the MSF would be partially screened from neighboring land uses with landscape elements combination with walls and fences, similar to the screening currently along the Vons property.

The existing streetscape design throughout the AVE would be maintained to the extent feasible while providing necessary upgrades such as ADA-compliant ramps. The proposed Project would not destroy, damage, or otherwise alter any of the five existing historic buildings in the Market Street segment and the scale, massing, and overall composition of each building would remain readily discernable to viewers despite some interruption of views by proposed guideway columns. The Build Alternative would result in no adverse effects by incorporating Avoidance Measures **VIS-1** through **VIS-4** related to aesthetic design treatments, streetscape improvements and lighting. Consultation regarding potential indirect adverse visual effects to historic properties will be conducted with interested parties in accordance with Section 106 of the National Historic Preservation Act of 1966 therefore, visual impacts are not anticipated.

### Environmental Justice Analysis

Adverse effects related to aesthetics and visual quality would primarily affect the EJ community within the Sports Village, which has the highest concentration of EJ populations in the EJ Affected Area. Adverse effects to the other surrounding EJ communities in the EJ Affected Area would be minimal based on the distance from the proposed alignment and nature of the proposed Project within the Sports Village. In addition, the residential viewers primarily reside north of Manchester Boulevard, between Hillcrest Drive and Prairie Avenue in the Sports Village neighborhood. Other adverse effects related to aesthetics and visual quality would be minimized with the implementation of Avoidance Measures **VIS-1** through **VIS-4**. As the communities in the EJ Affected Area are all EJ communities, environmental effects of the Build Alternative would be predominantly borne by EJ communities. With the implementation of avoidance measures, a disproportionately high and adverse effect related to aesthetics and visual quality facilities would not occur in EJ communities in the EJ Affected Area.

## 6.2.2 ENERGY RESOURCES

### Summary of Effects

**Not Adverse with Avoidance Measure**. Electricity demand for the proposed Project would result in a net increase of 22,367,567 kilowatt-hours per year. Southern California Edison (SCE) supplied approximately 64,564,000 megawatt-hours of electricity in 2019 and anticipates electricity consumption in the planning area to be approximately 122,500 gigawatt-hours in 2027. Electricity demand for the proposed Project during normal operation would result in a net increase of 22,367,567 kilowatt-hour per year and would be within the supply capacity of SCE. The proposed Project would need to be reevaluated by SCE prior to coming online as upgrade details are finalized as described in Avoidance Measure **ENG-1**. This would ensure that project operation would not affect the reliability of the existing electrical grid. Therefore, the proposed Project would not result in an adverse effect related to direct energy consumption.

### Environmental Justice Analysis

The Build Alternative would result in a net increase of in electricity demand and although the proposed Project would be within the supply capacity of SCE, a revaluation by SCE would be needed after system upgrades are finalized. The overall effect would be on the regional SCE capacity and not directly from the proposed Project. Implementation of Avoidance Measure **ENG-1** would ensure that project operation would not affect the reliability of the existing electrical grid. Therefore, adverse effects adverse effects on the EJ communities in the Affected Area would not occur and are not borne disproportionately by minority or low-income communities. Therefore, a disproportionately high and adverse effect related to energy demand would not occur in EJ communities in the EJ Affected Area.

### 6.2.4 NOISE AND VIBRATION

#### Summary of Effects

**Not Adverse with Avoidance Measures**. Operational noise would be produced by the ATS and stationary sources such as the MSF site, PDS substations, backup generators, and stations. Stationary noise sources such as PDS substations and backup generators would be screened to control noise levels. Additionally, the backup generators would only operate intermittently for testing. The detailed noise analysis prepared for each of the possible technologies, which accounted for the performance standards set in Avoidance Measure **NV-1**, did not identify moderate or severe impacts from transit movements along the alignment. A moderate impact was identified at the residences adjacent to the MSF regardless of the transit technology. Avoidance Measure **NV-2** would reduce the predicted adverse effects from operation of the MSF. Because the final operational details, site plan, and equipment layout at the MSF are currently unknown, **NV-2** provides performance-based requirements for additional analysis after design-level details have been developed. Implementation of Avoidance Measure **NV-2** would result in no impact at these residences.

#### Environmental Justice Analysis

Adverse effects related to noise would primarily affect the EJ community within the Sports Village, which has the highest concentration of EJ populations in the EJ Affected Area. Adverse effects to the other surrounding EJ communities with lower concentrations of EJ populations in the EJ Affected Area would be reduced based on the distance from the proposed alignment and nature of the proposed Project within the Sports Village. A moderate impact was identified at the residences adjacent to the MSF located in the Sports Village community regardless of the transit technology. Implementation of Avoidance Measures **NV-1** and **NV-2** would reduce adverse noise effects and would be implemented equally throughout the project corridor where residential land uses are located. Similar noise project measures and mitigation have been equally implemented throughout Metro's system in both EJ and non-EJ communities to minimize adverse effects to the extent feasible. As the communities in the EJ Affected Area are all EJ communities, environmental effects of the Build Alternative would be predominantly borne by EJ communities. With the implementation of avoidance measures, a disproportionately high and adverse effect related to noise would not occur in EJ communities in the EJ Affected Area.

# 7.0 CONSTRUCTION EFFECTS

## 7.1 NO BUILD ALTERNATIVE

**Not Adverse.** Detailed in Section 2.1, the No Build Alternative includes a TMOP developed by the City in 2020 to address future traffic demands that may result from events at SoFi Stadium. Construction activities may include, but are not limited to, construction staging, materials stockpiling, hauling of dirt and materials, and temporary street and lane closures. Temporary easements may also be required. However, construction activities would be temporary and would not result in long-term impacts to surrounding communities. Furthermore, projects built under the No Build Alternative would implement project-specific construction-related measures to reduce and minimize potential adverse effects. Therefore, no adverse effects on EJ communities would occur, and a disproportionately high and adverse effect would not occur in the EJ communities in the EJ Affected Area.

## 7.2 BUILD ALTERNATIVE

### 7.2.1 TRANSIT FACILITIES

#### Summary of Effects

**Not Adverse with Avoidance Measure**. Construction activities would not occur at Metro K Line tracks or stations platforms and would not interfere with operations of that system. Existing bus stops may potentially need to be temporarily relocated during construction activities. The bus stop on the west side of Locust Street serving Metro Bus Lines 211 and 607 and the bus stop on the south side of Florence Avenue serving Metro Bus Lines 40 and 111 may need to be temporarily relocated during certain Market Street/Florence Avenue station construction activities. Rerouting of transit along Manchester Boulevard would need to occur during temporary full closure of Manchester Boulevard. Full street closures would occur mostly during off-peak late-night hours. Additionally, rerouting of transit to La Brea Avenue would need to occur during temporary full closure of Prairie Avenue and Manchester Boulevard. It is not currently known if these bus lines would continue to operate along the same routes when the Metro K Line commences operation. If these bus lines are shortened, terminated, or rerouted when the Metro K Line commences operations, then no transit circulation/access would be affected. Pursuant to Avoidance Measure **TRANS-1**, such temporary relocation of bus stops would be coordinated with Metro and other transit providers. Avoidance Measure **TRANS-1** would also be implemented to ensure access to bus transit stops and bus circulation are always maintained, unless infeasible and closure is approved by the City, and coordination with Metro and any other transit service providers where the proposed Project could affect transit services.

#### Environmental Justice Analysis

Adverse effects related to transit facilities would primarily affect the EJ community within the Sports Village neighborhood, which has the highest concentration of EJ populations in the EJ Affected Area. Adverse effects to the other surrounding EJ communities with lower concentrations of EJ populations in the EJ Affected Area would be reduced based on the distance from the proposed alignment and the location of the construction activities and transit lines. Nonetheless, the shortened, terminated, or rerouted transit lines and relocation of bus stops would affect the residents and visitors of each EJ community within the EJ Affected Area and disrupt transit services to these areas. As the communities in the EJ Affected Area are all EJ communities, environmental effects of the Build Alternative would be predominantly borne by EJ communities. Implementation of Avoidance Measure **TRANS-1** would ensure access to bus transit stops and bus circulation are always maintained and the avoidance measure would be implemented equally throughout the

project corridor. With the implementation of the avoidance measure, a disproportionately high and adverse effect related to transit facilities would not occur in EJ communities in the EJ Affected Area.

### 7.2.2 VEHICLE CIRCULATION AND ON-STREET PARKING

#### Summary of Effects

**Not Adverse with Avoidance Measures**. Construction activities would primarily occur within the public right-of-way requiring temporary lane closures and parking loss. Effects associated with street closures would be minimized by implementation of Avoidance Measure **TRANS-2**, which requires development of a Construction Staging and Traffic Control Program. Traffic and parking effects would be minimized by implementation of Avoidance Measure **TRANS-3**, which requires a Parking Management Plan.

*Market Street, Market Street/Florence Avenue Station, and Public Parking Lot Construction*. Construction along Market Street would include drilling foundations for the ATS guideway, construction of the guideway columns and column caps. Vehicular access to alleys and driveways along Market Street, Florence Avenue, Regent Street and Locust Street within the construction area will be maintained at all times during construction.

*Manchester Boulevard, MSF Structure Site, and Prairie Avenue/Manchester Boulevard Station*. The construction area along the south side of Manchester Boulevard would include approximately 22 feet of public right-of-way from southerly face of curb, excluding sidewalks, from Prairie Avenue to Market Street, and would be delineated with K-rails. To minimize traffic effects, in the event that partial lane closures are necessary for a longer duration, lane reversals (or contra flow) and restriction of turns may be implemented to facilitate the peak hour traffic flow. Additionally, traffic control at intersections within the construction areas at intersections would be maintained similar to existing conditions at all times. However, temporary full street closure along Manchester Boulevard within the construction area would occur during aerial construction of the railway formwork.

The construction area on the north side of Manchester Boulevard between Locust Street and Hillcrest Boulevard would result in the loss of on-street parking and one travel lane in the westbound direction. To minimize traffic effects, in the event that partial lane closures are necessary for a longer duration, lane reversals (or contra-flow) may be implemented to facilitate the peak hour traffic direction. Traffic control at intersections within the construction areas at intersections would be maintained similar to existing conditions at all times. Construction activities would result in the temporary removal of all on-street parking spaces along Manchester Boulevard within the construction area, although not all at the same time. Access to and from all alleys at one or both ends of the alley when possible. If an alley is obstructed such that a turnaround by any vehicle is not feasible, traffic flaggers shall be provided to control access to/from the alley. Therefore, construction activities would not result in the loss of vehicular access to parcels and various land uses in the vicinity of construction area.

Closure of travel lanes along Manchester Boulevard, Hillcrest Boulevard, Spruce Avenue, and Nutwood Street is not anticipated during construction of the MSF. Construction would not affect the vehicular driveways along Manchester Boulevard, Hillcrest Boulevard, Spruce Avenue and Nutwood Street within the construction area. Therefore, construction activities would not result in the loss of vehicular access to parcels and various land uses in the vicinity of construction area. Construction of the Prairie Avenue/Manchester Boulevard station would not include long-term closure of travel lanes along these roadways during the duration of construction. Therefore, construction activities would not result in the loss of vehicular access to parcels and various land uses in the vicinity of the construction area.

*Prairie Avenue and Prairie Avenue/Hardy Street Station Construction*. Construction activities to allow for the realignment of Prairie Avenue include removal and disposal of existing sidewalks, roadways, landscape, and medians as needed, including the installation of new or temporary pavement and asphalt for road work

and sidewalks, along the east side of Prairie. Because a new temporary roadway on the east side of Prairie Avenue is constructed prior to installing the K-rail system, the roadway lanes in the southbound direction along Prairie Avenue would be maintained. Additionally, traffic control at intersections within the construction areas would be maintained similar to existing conditions at all times.

Construction activities include drilling foundations for the ATS guideway along the west side of Prairie Avenue from Manchester Avenue to Hardy Street. Temporary full street closure along Prairie Avenue would be needed from a safety perspective, during aerial construction of the railway formwork. To minimize traffic effects, temporary full closures would be coordinated with the City of Inglewood and emergency response personnel. Detour routes are included in Avoidance Measure **TRANS-2** and would be updated as necessary to minimize traffic impacts on residential streets. Avoidance Measure **TRANS-2** includes coordination with the City, police, and fire services department regarding maintenance of emergency access and response times and require access be maintained for public safety vehicles (e.g., police, fire, and emergency response).

Periodic temporary lane closures would be needed to allow access to the aerial construction platforms, installation of equipment, completion of platforms, stations, and electrical systems, and completing roadway improvements and modifications. Vehicular access to driveways to parcels along Prairie Avenue within the construction area would be maintained at all times. Therefore, construction activities would not result in the loss of vehicular access to parcels and various land uses in the vicinity of construction area.

There are no on-street parking spaces along Prairie Avenue between Manchester Boulevard and Hardy Street and therefore, construction activities would not result in the temporary loss of on-street parking spaces. The off-street parking spaces on the site of the Forum within the setback area on the east side of Prairie Avenue between Manchester Boulevard and Kelso Street/Pincay Drive would be affected and reconfiguration of parking spaces would be required. A loss of approximately 95 spaces would be anticipated in this area. Construction of the Prairie Avenue/Hardy Street station would not require long-term closure of any travel lanes along these roadways during the duration of construction. However, intermittent short-term curb lane closures may occur. Construction would not affect the vehicular driveways to parcels along Prairie Avenue and Hardy Street within the construction area. Therefore, construction activities would not result in the loss of vehicular access to parcels and various land uses in the vicinity of construction area.

### Environmental Justice Analysis

Adverse effects related to vehicle circulation and on-street parking would primarily affect the EJ community within the Sports Village neighborhood, which has the highest concentration of EJ populations in the EJ Affected Area. Adverse effects to the other surrounding EJ communities with lower concentrations of EJ populations in the EJ Affected Area would be reduced based on the distance from the proposed alignment and the location of the construction activities and affected streets. However, impacted streets and parking as a result of temporary construction activities would affect the residents and visitors of each EJ community within the EJ Affected Area and would inconvenience access to surrounding streets. As the communities in the EJ Affected Area are all EJ communities, environmental effects of the Build Alternative would be predominantly borne by EJ communities. Implementation of Avoidance Measures **TRANS-2** and **TRANS-3** would minimize effects to the extent feasible and the avoidance measure would be implemented equally throughout the project corridor. With the implementation of the avoidance measure, a disproportionately high and adverse effect related to transit facilities would not occur in EJ communities in the EJ Affected Area.

## 7.2.3 PEDESTRIAN AND BICYLCE FACILITIES

### Summary of Effects

**Not Adverse with Avoidance Measure**. Construction activities include removal of existing sidewalks as needed and replacement with new or temporary sidewalks. All existing crosswalks would be maintained unless it is infeasible to do so. Temporary sidewalks would be provided for the duration of the construction, in order to maintain pedestrian circulation. Temporary alternate routes to school would be identified working

closely with IUSD and the City. Pursuant to the Construction Staging and Traffic Control Program, there would be temporary pedestrian sidewalks for the duration of the construction, in order to maintain pedestrian circulation to the degree feasible. Under Avoidance Measure **TRANS-4**, sidewalk closures would be avoided to the degree feasible and are permitted only when approved by the City with accessible detours provided if sidewalk closures are necessary. Special attention would be given to periods of expected heavy traffic from events scheduled at SoFi Stadium and other venues in the Los Angeles Sports and Entertainment District at Hollywood Park, the Forum, and the Inglewood Basketball and Entertainment Center. Pedestrian access to adjacent buildings will be maintained at all times. If a crosswalk is removed from service, temporary accessible replacement crosswalks as close as practicable to the original crosswalk locations would be provided, unless the City determines that a replacement crosswalk is not necessary to maintain an adequate level of service. Replacement crosswalks would be identified and controlled by wayfinding signs approved by the City. Therefore, the proposed Project would not result in an adverse effect related to pedestrian facilities.

There are currently no bicycle facilities provided along Market Street, Regent Street, Manchester Boulevard within the construction area, Hillcrest Boulevard, Spruce Avenue, Nutwood Street, Prairie Avenue, or Hardy Street. Potential temporary closure of the southbound bicycle lane along Locust Street between Florence Avenue and Regent Street may occur due to Market Street/Florence Avenue station construction activities. Pavement markings known as “sharrows” may be explored by the contractor and City to allow shared use of the travel lane by vehicles and bicycles, if necessary. Therefore, the proposed Project would not result in an adverse effect related to bicycle facilities.

### Environmental Justice Analysis

Adverse effects related to pedestrian and bicycle facilities would primarily affect the EJ community within the Sports Village neighborhood, which has the highest concentration of EJ populations in the EJ Affected Area. Adverse effects to the other surrounding EJ communities with lower concentrations of EJ populations in the EJ Affected Area would be reduced based on the distance from the proposed alignment and the location of the construction activities and transit lines. Although impacted pedestrian facilities and sidewalks would be primarily located in the Sports Village neighborhood, the use of sidewalks would affect the residents and visitors from each EJ community within the EJ Affected Area. As the communities in the EJ Affected Area are all EJ communities, environmental effects of the Build Alternative would be predominantly borne by EJ communities. Implementation of Avoidance Measure **TRANS-4** would maintain sidewalks to the extent feasible and the avoidance measure would be implemented equally throughout the project corridor as necessary. With the implementation of the avoidance measure, a disproportionately high and adverse effect related to transit facilities would not occur in EJ communities in the EJ Affected Area.

## 7.2.4 AESTHETICS AND VISUAL QUALITY

### Summary of Effects

**Not Adverse with Avoidance Measure.** Anticipated effects on visual resources during construction would be like those typical of rail projects, including the presence of heavy equipment and traffic control measures. Users in buildings or on streets and sidewalks would encounter views of the construction. Residents in adjacent homes and employees in local businesses would likely perceive construction activities as visually disruptive. Staff of railroads, businesses, and commuters would likely view construction activities as visually disruptive. Nighttime construction lighting would be temporary in nature. The CCP outlines measures to be taken to limit nighttime light spillage and glare to adjacent uses. Any nighttime construction activities would require a permit from the Permits and License Committee of the City. The proposed Project would comply with any conditions identified by the City to reduce nighttime construction lighting. In addition, Avoidance Measure **VIS-5** would minimize adverse effects.

### Environmental Justice Analysis

Adverse effects related to visual resources during construction would primarily affect the EJ community within the Sports Village neighborhood, which has the highest concentration of EJ populations in the EJ Affected Area. Adverse effects to the other surrounding EJ communities in the EJ Affected Area would be minimal based on the distance from the proposed alignment and nature of the proposed Project within the Sports Village neighborhood. The severity of impacts would also be largely uniform throughout the Project corridor. As the communities in the EJ Affected Area are all EJ communities, environmental effects of the Build Alternative would be predominantly borne by EJ communities. The implementation of Avoidance Measure **VIS-5** and would minimize or avoid nighttime construction lighting effects would be implemented equally throughout the project corridor. With the implementation of the avoidance measure, a disproportionately high and adverse effect related to nighttime construction and visual quality would not occur in EJ communities in the EJ Affected Area.

## 7.2.5 AIR QUALITY

### Summary of Effects

**Not Adverse**. Construction of the proposed Project would have the potential to temporarily emit criteria air pollutant emissions through the use of heavy-duty construction equipment and through vehicle trips generated from workers and haul trucks traveling to and from construction areas. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. The emission estimates account for implementation of Avoidance Measure **AQ-1**, which requires cleaner-burning off-road construction equipment. The emissions analysis shows that emissions would not exceed significance thresholds established by the SCAQMD. Projects under the purview of the FTA are not required to utilize local significance thresholds, although the SCAQMD significance thresholds are used here as indicator for an adverse effect. Furthermore, pollutant concentrations would not exceed National Ambient Air Quality Standards. Therefore, construction activities would not result in an adverse effect related to air quality.

### Environmental Justice Analysis

Adverse effects related to temporarily criteria air pollutant emissions during construction would not occur in EJ communities with higher and lower concentrations of EJ populations and would not be concentrated in one EJ community. In addition, air quality emissions are regional and are not borne disproportionately by minority or low-income communities. Avoidance Measure **AQ-1** would be implemented equally throughout the project corridor. With the implementation of the avoidance measure, a disproportionately high and adverse effect related to air quality would not occur in EJ communities in the EJ Affected Area.

## 7.2.6 BIOLOGICAL RESOURCES

### Summary of Effects

**Not Adverse with Avoidance Measure**. Demolition and clearing of existing vegetation, and construction of the guideway, stations, and support facilities would result in the removal and/or trimming of trees and other ornamental vegetation and structures suitable for nesting birds. While preservation of trees would be prioritized, in cases where removal and/or trimming of trees is unavoidable, the demolition and construction efforts could result in a take of migratory birds, nests, or eggs protected under the MBTA and would constitute a violation of the MBTA. Avoidance Measure **BIO-1** would ensure protection of nesting birds during construction. Therefore, construction activities would not result in an adverse effect related to migratory birds.

Of the 502 trees identified in the Project corridor that qualify as protected under the provisions of the City's Tree Preservation Ordinance, approximately 358 occur within construction zones. In accordance with the Tree Removal and Replacement Plan included in the CCP, trees are required to be replaced at a minimum 1:1 ratio and with a tree of like-size and species or an equal value tree (or trees) as determined by the City.

Avoidance Measure **BIO-1** and Project compliance with all local tree ordinances would protect nesting birds and ensure replacement of removed protected trees. Therefore, construction activities would not result in an adverse effect related to trees.

### Environmental Justice Analysis

Adverse effects related to biological resources would primarily affect the EJ community within the Sports Village neighborhood, which has the highest concentration of EJ populations in the EJ Affected Area. Adverse effects to the other surrounding EJ communities with lower concentrations of EJ populations in the EJ Affected Area would be minimal based on the distance from the proposed alignment and the location of the construction activities and trees. Construction activities and tree locations are predominately located within the Sports Village neighborhood. As the communities in the EJ Affected Area are all EJ communities, environmental effects of the Build Alternative would be predominantly borne by EJ communities. Implementation of Avoidance Measure **BIO-1** would ensure protection of nesting birds during construction and the replacement of removed protected trees. The avoidance measure would be implemented equally throughout the project corridor. With the implementation of the avoidance measure, a disproportionately high and adverse effect related to biological resources would not occur in EJ communities in the EJ Affected Area.

## 7.2.7 GEOLOGY

### Summary of Effects

**Not Adverse with Avoidance Measures**. The nearest Alquist-Priolo Earthquake Fault Zones are two segments of the Newport-Inglewood fault zone located approximately 280 feet west of the alignment along Market Street (the Inglewood Fault), and approximately 2,750-feet east of the proposed Project from the intersection of Manchester Boulevard and Prairie Avenue (the Potrero Fault). The proposed Project, however, is close to several potentially active faults, including the Townsite Fault, Centinela Creek Fault, Inglewood Park Cemetery Fault, and Manchester Fault. The Townsite Fault, in particular, may traverse the alignment. The Townsite, Centinela Creek, Inglewood Park Cemetery, and Manchester Faults locations near the Inglewood Fault and Potrero Fault, which are active and local components of the Newport-Inglewood Fault Zone, suggest that these faults should be considered active with the potential for fault rupture.

The proposed Project design would comply with the provisions of the California Building Code and elevated structures that may cross a fault segment would be designed in conformance with Caltrans Memorandum to Designers 20-8 and 20-10 to avoid or minimize fault rupture zones or designed to take into account potential displacement from a fault offset, dynamic response due to ground shaking, and any other fault-induced hazards, such as creep. Portions of the proposed Project, including the PDS substations, would be subject to review by City building officials. Implementation of Avoidance Measure **GEO-1** would prevent impacts by locating structural improvements to avoid faults where feasible and designing the guideway, columns, and elevated passenger walkways to account for the effects that may result from fault displacement. With implementation of Avoidance Measure **GEO-2**, the trend of the Townsite Fault would be determined through an investigation prior to final design of the proposed Project with the findings dictating the placement of structural improvements to ensure impacts related to fault rupture would be minimized or avoided. Implementation of Avoidance Measure **GEO-3** would ensure that the design of the proposed improvements adhere to specific seismic and structural design criteria. Therefore, construction activities would not result in an adverse effect related to geology.

### Environmental Justice Analysis

Adverse effects related to geologic hazards would primarily affect the EJ community within the Sports Village neighborhood, which has the highest concentration of EJ populations in the EJ Affected Area. Adverse effects to the other surrounding EJ communities with lower concentrations of EJ populations in the EJ Affected Area would be reduced based on the distance from the proposed alignment and nature of the proposed Project within the Sports Village neighborhood. However, the geologic hazards are regional and are

not borne disproportionately by minority or low-income communities. As the communities in the EJ Affected Area are all EJ communities, environmental effects of the Build Alternative would be predominantly borne by EJ communities. Avoidance Measures **GEO-1** through **GEO-3** would be implemented equally throughout the project corridor as necessary and would minimize or avoid adverse effects. With the implementation of the avoidance measures, a disproportionately high and adverse effect related to geologic hazards would not occur in EJ communities in the EJ Affected Area.

### 7.2.8 HAZARDOUS MATERIALS

#### Summary of Effects

**Not Adverse with Avoidance Measures**. Construction activities would include excavation and grading. There is potential for contaminated soils to be disturbed during these activities, especially at the MSF site as it would be constructed within a site that includes a gas station. The site is associated with a previous leaking underground storage tank (LUST) case (granted closure by the LARWQCB on July 19, 1996) and currently operates at least one UST. All underground storage tanks (USTs) on the 500 and 510 East Manchester Boulevard site would be decommissioned and removed as part of the proposed Project. Implementation of a Hazardous Materials Contingency Plan and Health and Safety Plan, included in Avoidance Measure **HAZ-1**, would provide guidance on the decommissioning and subsequent removal. In addition, closure of the gas station and removal of the UST and associated infrastructure would be subject to the requirements of LACFD and Los Angeles Regional Water Quality Control Board. Implementation of a Soil Management Plan would assist in determining whether there are previously unidentified impacted soils on the site. Avoidance Measure **HAZ-1** also includes a Building Demolition Plan requiring an evaluation of all buildings to be demolished as part of the proposed Project. The Building Demolition Plan would adhere to applicable rules and regulations, including SCAQMD Rule 1403 and Cal/OSHA regulations related to the handling of lead-based paints, asbestos containing materials, polychlorinated biphenyls, mercury, or chlorofluorocarbons.

Construction activities would involve the use of solvents, paints, oils, fuels and grease, all materials that are typically used in construction projects. Applicable regulations cover hazardous materials–related topics such as proper personal protective equipment, transport, handling, and disposal, among others. Releases involving common construction hazardous materials would be localized and spills that may occur would be contained and cleaned according to the material's Safety Data Sheet in the appropriate manner as they occur. Compliance with Avoidance Measure **HAZ-1** would address potential adverse conditions to construction workers and the public and ensure that contaminated media removal is consistent with existing regulations. Therefore, construction activities would not result in an adverse effect related to hazardous materials.

#### Environmental Justice Analysis

Adverse effects related to hazardous materials would primarily affect the EJ community within the Sports Village neighborhood, which has the highest concentration of EJ populations in the EJ Affected Area. Adverse effects to the other surrounding EJ communities in the EJ Affected Area would be reduced based on the distance from the proposed alignment and nature of the proposed Project within the Sports Village neighborhood. As the communities in the EJ Affected Area are all EJ communities, environmental effects of the Build Alternative would be predominantly borne by EJ communities. The implementation of Avoidance Measure **HAZ-1** would address potential adverse conditions to construction workers and the public and ensure that contaminated media removal is consistent with existing regulations. This avoidance measure would be implemented equally throughout the project corridor. With the implementation of the avoidance measure, a disproportionately high and adverse effect related to hazardous materials would not occur in EJ communities in the EJ Affected Area.

## 7.2.9 HISTORIC, ARCHAEOLOGICAL, AND PALEONTOLOGICAL RESOURCES

### Summary of Effects

Construction would require excavation, grading, drilling, and other related construction activities that involve extensive ground disturbance that could expose undiscovered archaeological artifacts. As much of the area has experienced prior development, the potential for such discoveries is considered low. Deeper ground disturbing activities, such as drilling for columns, would involve techniques that would not provide for successful recovery of any artifacts as they would be destroyed during drilling. Therefore, there is a potential significant impact for unearthing or destroying previously unknown archaeological resources during construction. Implementation of Avoidance Measure **TCR-1** would require retention of a tribal cultural resource monitor to monitor construction activities when ground disturbing activities occur to ensure that previously unknown tribal cultural artifacts are not destroyed during the construction process. Avoidance Measure **TCR-2** would require that a program is implemented to define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance, data recovery (including halting or diverting construction so that archaeological remains can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement, and reporting. Avoidance Measure **TCR-3** would be implemented to provide construction personnel appropriate training to properly implement the Monitoring and Mitigation Program outlined as part of **TCR-2**. Avoidance Measure **TCR-4** would be implemented to ensure that archaeological monitors, in a supplementary role to tribal cultural resource monitors are present to monitor and oversee ground disturbing activities. Finally, Avoidance Measure **TCR-5** describes the process and measures to be implemented in the event that construction activities inadvertently unearth human remains. Therefore, construction activities would not result in an adverse effect related to archeological and paleontological resources.

### Environmental Justice Analysis

Adverse effects related to archeological and paleontological resources would primarily affect the EJ community within the Sports Village neighborhood, which has the highest concentration of EJ populations in the EJ Affected Area. Adverse effects to the other surrounding EJ communities with lower concentrations of EJ populations in the EJ Affected Area would be minimal based on the distance from the proposed alignment and the location of the construction activities. Construction activities are predominately located within the Sports Village neighborhood. As the communities in the EJ Affected Area are all EJ communities, environmental effects of the Build Alternative would be predominantly borne by EJ communities. Avoidance Measures **TCR-1** through **TCR-5** would be implemented equally throughout the project corridor. With the implementation of the avoidance measures, a disproportionately high and adverse effect related to biological resources would not occur in EJ communities in the EJ Affected Area.

## 7.2.10 NOISE

### Summary of Effects

**Not Adverse with Avoidance Measure**. A construction noise analysis was completed based on anticipated equipment use and truck trips. Noise levels were adjusted for the anticipated construction intensity during the various construction shifts (daytime, evening, nighttime). Distances between construction activities for each of the phases and staging area locations (noise source), and surrounding noise-sensitive receptors were measured using concept plans for the proposed Project and aerial imagery. The analysis accounted for Avoidance Measure **NV-3**, which is a Construction Noise Control Plan that proactively addresses the potential effects of noise during construction. The Construction Noise Control Plan would include a monitoring plan during demolition and construction activities to ensure noise levels are below the specified noise limits. Therefore, construction activities would not result in an adverse effect related to noise.

With respect to potential nighttime disturbance from construction noise, the area surrounding the proposed Project that would experience an indoor noise level of greater than 50 dBA (exterior construction noise level

of greater than 62 dBA $L_{eq}$) during a worst-case or loudest maximum nighttime construction noise level event was identified. Based on the preceding impact analysis, exterior noise levels at all analyzed locations would be above 62 dBA $L_{eq}$ prior to the addition of construction noise. It is not anticipated that construction activities would result in adverse health effects related to pain and hearing loss as noise levels would not exceed the threshold 62 dBA $L_{eq}$.

### Environmental Justice Analysis

Adverse effects related to noise would primarily affect the EJ community within the Sports Village neighborhood, which has the highest concentration of EJ populations in the EJ Affected Area. Adverse effects to the other surrounding EJ communities in the EJ Affected Area would be reduced based on the distance from the proposed alignment and nature of the proposed Project within the Sports Village neighborhood. Temporary construction effects would be predominantly borne by EJ communities and the adverse effects in each EJ community would not result in appreciably more severe or greater in magnitude adverse effects than other areas. Avoidance Measure **NV-3** would ensure noise levels are below the specified noise limits and the avoidance measure would be implemented equally throughout the project corridor. With the implementation of the avoidance measure, a disproportionately high and adverse effect related to noise would not occur in EJ communities in the EJ Affected Area.

## 7.2.11 VIBRATION

### Summary of Effects

**Not Adverse with Avoidance Measure**. A groundborne vibration analysis was completed for onsite (dozers, loaders, etc.) and on-road (water trucks, dump trucks, etc.) construction equipment. In accordance with FTA guidance, vibration impacts are evaluated based on the maximum vibration levels generated by each type of construction equipment. The analysis shows that vibration levels associated with impact pile drivers would exceed the building damage criterion at multiple buildings located within 55 feet of activities.

As required by the CCP, a Community Affairs Liaison would be identified who would be responsible for responding within 24 hours to any local complaints about construction activities related to noise and vibration. Additionally, implementation of Avoidance Measure **NV-4** would require preparation of a Construction Vibration Reduction Plan to ensure minimization of construction vibration at nearby sensitive receptors from vibration created by construction activities. Avoidance Measure **NV-4** also requires various other vibration-minimizing techniques such as locating certain construction equipment at minimum distances from vibration-sensitive receptors to limit the potential for building damage with adjusted distance of construction equipment; and requires repairs to buildings if damage is caused by vibration or movement during the demolition and/or construction activities. With implementation of the CPP and Avoidance Measure **NV-4**, vibration damage of buildings due to groundborne vibration from construction would be avoided or repaired. Therefore, construction activities would not result in an adverse effect related to vibration.

### Environmental Justice Analysis

Adverse effects related to vibration impacts would primarily affect the EJ community within the Sports Village neighborhood, which has the highest concentration of EJ populations in the EJ Affected Area. Adverse effects to the other surrounding EJ communities with lower concentrations of EJ populations in the EJ Affected Area would be reduced based on the distance from the proposed alignment and nature of the proposed Project within the Sports Village neighborhood. Temporary construction effects would be predominantly borne by EJ communities and the adverse effects in each EJ community would not result in appreciably more severe or greater in magnitude adverse effects than other areas. Avoidance Measure **NV-4** would be implemented equally throughout the project corridor where impacts have been identified. With the implementation of the avoidance measure, a disproportionately high and adverse effect related to vibration impacts would not occur in EJ communities in the EJ Affected Area.

## 7.2.13 SAFETY AND SECURITY

### Summary of Effects

**Not Adverse with Avoidance Measure**. Temporary storage of construction equipment within the staging areas and segments of the alignment under construction would be fenced to increase construction safety, and nighttime security lighting would be implemented to deter potential criminal activities along the alignment. IPD and LACFD would continue to provide emergency services to residences and businesses throughout the construction period. The City would establish a Project Task Force that would provide input into the Construction Staging and Traffic Control Program to ensure emergency access and response times are maintained at all times. Although traffic operations at intersections adjacent to construction activities may deteriorate as a result of the reduced capacity, the Construction Staging and Traffic Control Program identified in Avoidance Measure **TRANS-1** would involve prior notification of construction activities to emergency service providers, allowing first responders to access properties via alternate routes.

Regarding pedestrian safety, potential intermittent closure of the sidewalks within the construction area may occur due to safety measures. The contractor would coordinate with the Inglewood Unified School District (IUSD) and provide crossing guards at locations requested by the City when crosswalks or sidewalks are closed. Therefore, construction activities would not result in an adverse effect related to security and safety hazards.

### Environmental Justice Analysis

Adverse effects related to safety and security would primarily affect the EJ community within the Sports Village neighborhood, which has the highest concentration of EJ populations in the EJ Affected Area. Adverse effects to the other surrounding EJ communities in the EJ Affected Area would be minimal based on the distance from the proposed alignment and nature of the proposed Project within the Sports Village neighborhood. As the communities in the EJ Affected Area are all EJ communities, environmental effects of the Build Alternative would be predominantly borne by EJ communities. Adverse effects related to safety and security would occur in EJ communities with higher and lower concentrations of EJ populations. Implementation of Avoidance Measure **TRANS-1** would ensure emergency access and response times are maintained at all times and would be implemented equally throughout the project corridor. With the implementation of the avoidance measure, a disproportionately high and adverse effect related to safety and security would not occur in EJ communities in the EJ Affected Area.

## 7.2.12 UTILITIES

### Summary of Effects

**Not Adverse with Avoidance Measures**. Existing roadways and infrastructure along the alignment would require some reconfiguration to accommodate new elevated guideway structures and stations. In addition to surface improvements, utility infrastructure under the roadway surface may need to be relocated to accommodate the guideway columns, footings, and other components. Roadway reconfiguration along Market Street, Manchester Boulevard and Prairie Avenue are necessary to ensure that the existing roadway travel capacity would not be diminished or reduced in the final as-built conditions. The columns, for the most part, would be required to be located within the public right of way, either within sidewalks or parking lanes. Avoidance Measures **UT-1** and **UT-2** would ensure that utility relocations would be coordinated with regulatory agencies to eliminate service interruptions. Therefore, construction activities would not result in an adverse effect related to utilities.

### Environmental Justice Analysis

Adverse effects related to utility relocations would primarily affect the EJ community within the Sports Village neighborhood based on the location of the roadway. Sports Village has the highest concentration of EJ populations in the EJ Affected Area and adverse effects to the other surrounding EJ communities in the EJ

Affected Area would be minimal based on the distance from the proposed alignment and nature of the proposed Project within the Sports Village neighborhood. As the communities in the EJ Affected Area are all EJ communities, environmental effects of the Build Alternative would be predominantly borne by EJ communities. Adverse effects related to utility relocations would occur in an EJ community with higher and lower concentrations of EJ populations and would not be concentrated in one EJ community. With the implementation of avoidance measures and with consideration to off-setting benefits, a disproportionately high and adverse effect related to utility relocations would not occur in EJ communities in the EJ Affected Area.

# 8.0 AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES

## 8.1 OPERATIONS

### VISUAL QUALITY

**VIS-1** ***Tree Replacement***. A Tree Removal and Replacement Plan shall be developed by members of the Project Task Force, subject to review and acceptance by the City and/or the JPA, and shall adhere to the following principles:

- Tree removal and replacement shall comply with the City of Inglewood Municipal Code and the ITC Design Standards and Guidelines.
- Removal of existing healthy and flourishing trees shall be avoided where feasible.
- New permanent replacement trees shall be a 36-inch box of the same species as those removed, if appropriate for the location and not in conflict with new infrastructure. Alternative locations shall be approved by the City's Public Works Department.
- New permanent replacement palm trees shall be a minimum of 20 feet in height.
- The Contractor shall permanently replace trees within six (6) months of restoration and completion of that portion of streets that may impact the tree. To the extent feasible, the Contractor shall permanently replace trees on an ongoing basis so long as doing so does not conflict with future construction.
- If construction of the project requires pruning of native tree species, the pruning shall be performed in a manner that does not cause permanent damage or adversely affect the health of the trees.
- The Contractor shall maintain all permanent trees and other landscaping installed by the Contractor for a period of three (3) years from the date of planting and shall warranty the trees and landscaping for one (1) year after planting. Prior to the end of the one-year warranty period, the City and the Contractor shall conduct an inspection of all permanent replacement trees and landscaping for general health as a condition of final acceptance by the City. If, in the City's determination, a permanent replacement tree or landscaping does not meet the health requirements of the City, then the Contractor shall replace that tree within thirty (30) days. For any permanent trees or landscaping that must then be removed, the original warranty shall be deemed renewed commencing from when the tree or landscaping is replaced.

**VIS-2** ***Lighting***

**Station Design**

- Station canopies shall have indirect accent lighting.
- Lighting shall clearly highlight pedestrian paths including those to stairs, escalators, and elevators.
- Accent and functional lighting shall be strategically placed to minimize spillover.
- Accent and functional lighting controls shall be programmable, and sensor controlled to allow for energy efficiency and various settings such as daytime, nighttime, and event lighting.

**Guideway and Support Structure Design**

- Where provided, guideway indirect accent lighting shall complement station lighting design.
- Light fixtures shall be concealed or minimally visible.
- Accent and functional lighting shall be strategically placed to minimize spillover.
- Code required lighting along the guideway shall be designed to minimize visibility from the ground level.
- Street lighting shall be supplemented as needed to provide a consistent light level on the sidewalk and roadway along the project alignment.

**Maintenance and Storage Facility**

- Where provided, functional lighting shall be placed to minimize spillover.
- Building entrances shall be well lit.
- Lighting shall clearly highlight pedestrian paths including those to ramps, stairs, escalators, and elevators.
- Public uses on the ground plane of the MSF Site including any covered parking areas shall be well lit with particular attention paid to the comfort and safety of the public.

**Elevated Passenger Walkways**

- Where provided, functional lighting shall be placed to minimize spillover.
- Overall lighting design shall not interfere with roadway traffic below.
- Accent lighting shall complement station lighting design.
- Accent and general lighting controls shall be programmable and sensor controlled to allow for daytime, nighttime, and event settings.

**VIS-3** ***Tree Placement***

- An arborist report surveying the condition and extents of all existing trees in the Project area shall be provided to the developer for their use as a baseline in order to produce a final report detailing the most current conditions and proposed handling of all existing trees for the proposed Project.
- Existing flourishing trees (as identified in the arborist report) shall remain, where feasible.
- An Approved Plant Palette based on the City's approved street tree list shall be used as a basis for all sections of new trees.
- The quantity and species of existing trees removed by the ITC Project shall be replaced in accordance with the City's current landscape guidelines.
- Protected species in the Inglewood Municipal Code, Tree Preservation shall remain.
- City of Inglewood guidelines for tree spacing shall be followed, considering species of trees and the desired canopy coverage.
- Trees shall be planted on both sides of the roadway where feasible.
- Trees shall be positioned at regular intervals relative to the guideway column supports to create a consistent rhythm.
- On Market Street, trees shall be planted at a rhythm and scale to create a continuous visual canopy over the pedestrian realm, where feasible.
- On Manchester Boulevard, trees shall be planted at a rhythm consistent with the street trees east and west of the Project, in alignment with the shape of the roadway.
- On Prairie Avenue, trees on the east side shall continue the stately rhythm from the Inglewood

- Cemetery north of Manchester Boulevard. Trees on the west side shall be spaced to match the rhythm of the east side and the guideway support structure to the extent feasible.

**VIS-4** ***Signage***

- Physical Non-Digital Signage incorporated into the Project shall have a distinct visual graphic identity that is consistent across all physical design elements of the project.
- All signage shall be approved by City of Inglewood and the Authority Having Jurisdiction (AHJ).
- Existing signage along the entire ITC alignment, which is affected, shall be replaced along with its infrastructure, and shall meet its originally intended design intent and function.
- Signage replaced that originated on private property shall be approved by the City of Inglewood and the sign/property owner.

## ENERGY

**ENG-2** Prior to the award of the DBFOM contract, and start of construction, the City shall contact SCE and request an updated system Distribution Study to determine the amount of load that SCE could accommodate and required infrastructure upgrades in order to meet the recommended full redundancy design. Should SCE determine that additional system upgrades are required, such upgrades shall be the responsibility of the DBFOM contractor and/or the City to complete (including design and any additional environmental clearance), subject to the review and approval of SCE and the City, as applicable.

## NOISE AND VIBRATION

**NV-1** The exterior noise level generated by the ATS train, inclusive of all contributing noise sources, shall not exceed the levels specified in Section 2.2.1, Exterior Airborne Noise, ASCE 21-05 (American Society of Civil Engineers, Automated People Mover Standards - Part 2 Section 2.2.1, Exterior Airborne Noise, ASCE 21-05). The design of any barriers along the guideway designed to reduce noise shall be subject to the limits noted below.

**Exterior ATS Train Noise Limits**

| Condition | Maximum dBA Level | Measurement Location |
|---|---|---|
| Maximum length train entering and leaving station | 76 (slow response) | In the station, 5 feet from the platform edge and 5 feet above the station floor. |
| Maximum length train stopped in station | 74 (slow response) | In the station, 5 feet from the platform edge and 5 feet above the station floor, with vehicle doors and platform doors fully open. |
| Maximum length train traveling along the entire guideway under any normal velocity, acceleration, and deceleration operating condition | 76 (fast response) | At any point on a cylindrical envelope co-axial with, and50 feet from, the centerline of each guideway lane (track), whichever is closer. |
| Maximum length train traveling at 10 mph | 74 (fast response) | At any point on a cylindrical envelope co-axial with, and 50 feet from, the centerline of each guideway lane (track). |

**SOURCE**: American Society of Civil Engineers, *Automated People Mover Standards - Part 2 Section 2.2.1, Exterior Airborne Noise, ASCE 21-0.*

**NV-2** The City of Inglewood shall design and construct the MSF to reduce combined noise levels from all onsite equipment and activities to 62 dB $L_{dn}$ or less, at all surrounding residential uses. To achieve this performance standard, during the architectural and engineering design, and prior to the issuance of any building permits for the MSF, the City or their contractor shall retain an acoustical consultant to evaluate the design and provide written recommendations, as necessary, to reduce noise from all onsite equipment and activities. Such recommendations may include, but are not limited to, changes in site layout or equipment locations; sound power limits or specifications; rooftop parapet walls; acoustical absorption, louvers, screens, or enclosures; intake and exhaust silencers; or administrative controls (such as restricting certain activities to daytime hours). The recommendations shall be incorporated into the proposed Project plans prior to construction.

# 8.2 CONSTRUCTION

## TRANSPORTATION AND TRAFFIC

### Transit Facilities

**TRANS-1** The proposed Project shall:

- Ensure that access to bus transit stops and bus circulation are always maintained, unless infeasible and closure is approved by the City.
- Coordinate with Metro and any other transit service providers to:
  - Relocate bus stop(s) if necessary, during construction with appropriate wayfinding signage and information dissemination, with all temporarily relocated bus stops located as close as feasible to the original bus stop location.
  - Reroute transit bus lines if necessary, during construction with appropriate wayfinding signage and information dissemination.

### Vehicle Circulation and On-Street Parking

**TRANS-2** The proposed Project shall develop a Construction Staging and Traffic Control Program to address the following topics:

- Coordination with other public infrastructure projects within the City's boundaries.
- Detour routes, including analysis of impacts to pedestrian, business, bicycle, and traffic flow.
- Coordination of closures and restricted access during the construction period with special attention during periods of expected heavy traffic from events scheduled at SoFi Stadium and other venues in the Los Angeles Sports and Entertainment District at Hollywood Park, the Forum, and the Inglewood Basketball and Entertainment Center.
- Coordination with the City, police, and fire services department regarding maintenance of emergency access and response times.
- Monitoring and coordination of construction materials deliveries.
- Notification to businesses and residents on upcoming construction activities including but not limited to the establishment of a website with project construction information, signage, and web-based media.

The Traffic Control Program shall be updated as needed based on the following principals:

- Minimize traffic impacts on residential streets.
- Establish minimum traffic lane requirements for Manchester Boulevard, Florence Avenue, and Prairie Avenue during construction such that at least the full number of traffic lanes in the peak direction, and if feasible, one traffic lane in the off-peak direction is available, with

additional capacity provided through appropriate detour routes. The directional traffic lanes may be reversible to maintain the peak directional capacity in either direction as necessitated by traffic demands. For all other streets potentially affected by construction, maintain at least one lane of traffic in each direction unless otherwise approved by the City.

- Maintain access to and from all alleys at one or both ends of the alley when possible. If an alley is obstructed such that a turnaround by any vehicle is not feasible, traffic flaggers shall be provided to control access to/from the alley.
- Maintain access for all public safety vehicles (such as police, fire, and emergency response).
- Maintain bicycle and pedestrian access within the Project area or approved detours at all times.
- Provide adequate street access to City service vehicles, including but not limited to trash pickup and street sweeping service vehicles, during planned service times.
- Sidewalk closures shall be avoided to the degree feasible and are permitted only when approved by the City. Accessible detours shall be provided if sidewalk closures are necessary.
- Use traffic control officers/flaggers as appropriate to minimize the degree and duration of impacts and maintain safety.
- Establish and maintain wayfinding signage.
- Maintain vehicular and pedestrian access to all businesses and residents impacted by construction activities including roadway closures.
- Hold quarterly community outreach meetings with businesses and residents to provide updates on temporary, full, or partial street closures necessary for construction. Website will be updated 45 to 60 days prior to planned dates of any street closures.
- All closures, full or partial, are subject to City review and approval which shall consider measures to minimize the degree and duration of street and lane closures.

**TRANS-3** The proposed Project shall develop a Parking Management Plan to address the following topics:

- Parking, staging, or queuing of Project-related vehicles, including workers' personal or project-assigned vehicles, trucks, and heavy vehicles, shall be prohibited on City streets at all times, outside of a permitted workspace unless otherwise approved by the City. If the use of residential permit parking spots is necessary for construction, provide for equivalent overnight replacement parking for removed residential permit parking spots at the nearest possible location to the location where parking has been removed.
- Replace loss of metered parking spaces by making available an equivalent number of parking spaces in an off-street parking facility located near the lost parking. The parking spaces shall be provided for public use at a rate no greater than the metered parking rate.
- Provide public notice of the availability of the alternative parking spaces through outreach to businesses and residents with signage.

## Pedestrian and Bicycle Facilities

**TRANS-4** A Pedestrian Access Program shall be developed by members of the Project Task Force, subject to review and acceptance by the City and/or the JPA, and shall adhere to the following principles:

- Pedestrian access to buildings shall be maintained at all times. Maintain all crosswalks to the extent feasible. Whenever a crosswalk is removed from service, establish and maintain temporary accessible replacement crosswalks as close as practicable to the original crosswalk locations unless the City determines that a replacement crosswalk is not necessary

to maintain an adequate level of service. Replacement crosswalks shall be identified and controlled by wayfinding signs approved by the City.

- Establish and maintain passenger wayfinding signage.
- Maintain sidewalk access for pedestrians, including providing temporary sidewalks if existing sidewalks are disrupted during construction. Any sidewalk closures are subject to review and approval by the City.
- Sidewalks that are being maintained in a temporary condition shall meet all applicable safety standards, including but not limited to the requirements of the Americans with Disabilities Act and similar California laws for sidewalks being maintained in a temporary condition.
- Protect pedestrians from construction-related debris, dust, and noise; such protection may include the use of dedicated pedestrian barriers.
- Coordinate with the IUSD and the City to provide crossing guards at locations requested by IUSD or the City when crosswalks or sidewalks are closed. Identify temporary alternate routes to school, working closely with IUSD and the City, and disseminate this information to schools and stakeholders affected by construction.

## AESTHETICS AND VISUAL QUALITY

**VIS-5** Construction activities during evening and nighttime hours may require the use of temporary lighting. To minimize the impact of temporary lighting on adjacent properties, the following measures shall be implemented:

- Temporary lighting shall be limited to the amount necessary to safely perform the required work and shall be directed downwards and shielded. Care shall be taken in the placement and orientation of portable lighting fixtures to avoid directing lights toward sensitive receptors, including automobile drivers. Motorists and sensitive receptors shall not have direct views of construction light sources. Light sensitive receptors include but are not limited to residential areas and transient occupancy uses.
- Light trespass shall not exceed one foot-candle above ambient light level as measured at any adjacent residential and transient properties.
- Temporary sidewalks and any sidewalk adjacent to construction activities shall be illuminated to City Standards to protect public safety.
- To minimize the visual effects of construction the following measures shall be implemented:
  - Visually obtrusive erosion control devices, such as silt fences, plastic ground cover, and straw bales should be removed as soon as the area is stabilized.
  - Stockpile areas should be located in less visibly sensitive areas and pre-approved by the City. Stockpile locations, laydown, and staging areas shall be accessed by construction vehicles with minimal disruption near residential neighborhoods.

## AIR QUALITY

**AQ-1** At a minimum, use equipment that meets the U.S. Environmental Protection Agency (USEPA)'s Final Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 horsepower (hp) or greater, for all phases of construction activity, unless it can be demonstrated to the City Planning Division with substantial evidence that such equipment is not available. To ensure that Final Tier 4 construction equipment or better shall be used during the proposed Project's construction, the City shall include this requirement in applicable bid documents, purchase orders, and contracts. The City shall also require periodic reporting and provision of written construction documents by construction contractor(s) and conduct regular inspections to the maximum extent feasible to ensure and enforce compliance.

Such equipment will be outfitted with Best Available Control Technology devices including a California Air Resources Board (CARB)-certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPF are capable of achieving at least 85 percent reduction in particulate matter emissions. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by Final Tier 4 emissions standards for a similarly sized engine, as defined by the CARB's regulations. Successful contractors must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. The proposed Project representative will make available to the lead agency and Southern California Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, which will be used during construction. The inventory will include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, best available control technology (BACT) documentation, and CARB or SCAQMD operating permit shall be maintained on site at the time of mobilization for each applicable piece of construction equipment.

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

- The Contractor does not have the required type of off-road construction equipment within its current available inventory as to a particular vehicle or equipment by leasing or short-term rent, and the Contractor has attempted in good faith and with due diligence to lease or short-term rent the equipment or vehicle, but the equipment or vehicle is not available for lease or short-term rent within 120 miles of the Project area, and the Contractor has submitted documentation to the City showing that the requirements of this exception provision apply.
- The Contractor has been awarded funding by SCAQMD or another agency that would provide some or all of the cost to retrofit, repower, or purchase a piece of equipment or vehicle, but the funding has not yet been provided due to circumstances beyond the Contractor's control, and the Contractor has attempted in good faith and with due diligence to lease or short-term rent the equipment or vehicle that would comply, but the equipment or vehicle is not available for lease or short-term rent within 120 miles of the Project area, and the Contractor has submitted documentation to the City showing that the requirements of this exception provision apply.
- Contractor has ordered equipment or vehicle to be used on the construction project in compliance at least 60 days before that equipment or vehicle is needed at the Project alignment, but that equipment or vehicle has not yet arrived due to circumstances beyond the Contractor's control, and the Contractor has attempted in good faith and with due diligence to lease or short-term rent the equipment or vehicle that would comply, but the equipment or vehicle is not available for lease or short-term rent within 120 miles of the Project area, and the Contractor has submitted documentation to the City showing that the requirements of this exception provision apply.
- Construction-related diesel equipment or vehicle will be used on the Project for fewer than 20 calendar days per calendar year. The Contractor shall not consecutively use different equipment or vehicles that perform the same or a substantially similar function in an attempt to use this exception to circumvent the intent of this measure.
- Documentation of good faith efforts and due diligence regarding the previous exceptions shall include written record(s) of inquiries (i.e., phone logs) to at least three leasing/rental companies that provide construction on-road trucks and off-road equipment, documenting

the availability/unavailability of the required types of truck/equipment. The City will, from time-to-time, conduct independent audit of the availability of such vehicles and equipment for lease/rent within a 120-mile radius of the Project area, which may be used in reviewing the acceptability of the Contractor's good faith efforts and due diligence.

- Equipment such as concrete/industrial saws, pumps, aerial lifts, light stands, air compressors, and forklifts shall be electric or alternative-fueled (i.e., nondiesel). Pole power shall be utilized to the maximum extent feasible in lieu of generators. If stationary construction equipment, such as diesel-powered generators, must be operated continuously, such equipment must be Final Tier 4 construction equipment or better and located at least 100 feet from air quality sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.
- At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks (e.g., material delivery trucks and soil import/export with a gross vehicle weight rating of at least 14,001 pounds), or best commercially available equipment, that meet CARB's 2010 engine emissions standards at 0.01 g/hp-hour of particulate matter and 0.20 g/hp-hour of NOx emissions or newer, cleaner trucks, unless the Contractor provides written documentation consistent with project contract requirements the circumstances exist as described above and the Contractor submits the Plan. Operators shall maintain records of all trucks associated with Project construction to document that each truck used meets these emission standards. The City shall include this requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with Project construction to document that each truck used meets these emission standards and make the records available for inspection.
- Require the use of electric or alternatively fueled (e.g., natural gas) sweepers with high-efficiency particulate air (HEPA) filters.
- A publicly visible sign shall be posted with the Community Affairs Liaison's contact information to contact regarding dust complaints. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.
- All roadways, driveways, sidewalks, etc., being installed as part of the Project should be completed as soon as practicable; in addition, building pads should be laid as soon as practicable after grading.
- To the extent feasible, allow construction employees to commute during off-peak hours.
- Make access available for on-site lunch trucks during construction, as feasible, to minimize off-site construction employee vehicle trips.
- Every effort shall be made to utilize grid-based electric power at any construction site, where feasible.

## BIOLOGICAL RESOURCES

**BIO-1** The City shall require demolition and construction contractors to implement the following measures:

- Prior to initiating any demolition and/or construction activities, a nesting bird survey shall be conducted to determine the presence of any nesting birds within 500 feet of demolition and/or construction activities. In addition, nesting bird surveys shall be conducted at least every six months until the completion of construction activities, as specified below.
- Prior to any demolition and/or construction, and at least every six months during and prior to the raptor nesting season until the completion of construction activities, January 1 to September 1, a qualified biologist shall conduct a site survey for active nests 30 days prior to any scheduled clearing, demolition, grading, or construction activities. The survey shall be

conducted within all trees, manmade structures, and any other potential raptor nesting habitat.

- Prior to any vegetation disturbance between March 1 and September 15, and a least every six months until the completion of construction activities, a qualified biologist shall conduct a survey for nesting birds in all breeding/nesting habitat within the construction or demolition areas and within 300 feet of all disturbance areas and submit the results of these surveys to the City. The surveys shall be conducted within trees and structures, wherever nesting bird species may be located. Nesting bird surveys shall be conducted no earlier than 30 days prior to the initiation of ground or vegetation disturbance. If no breeding/nesting birds are observed, site preparation, demolition and construction activities may begin. If breeding activities and/or an active bird nest is located, the breeding habitat/nest site shall be fenced by the biological monitor a minimum of 300 feet (500 feet for raptors) in all directions, and this area shall not be disturbed until the nest becomes inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, and/or the young shall no longer be impacted. If the qualified biologist determines that a narrower buffer between the demolition and/or construction activities and the observed active nests is warranted, the biologist may submit a written explanation as to why (e.g., species-specific information; ambient conditions and bird's habituation to them; terrain, vegetation, and birds' lines of sight between the demolition and/or construction activities and the nest and foraging areas) to the City and, upon request, the California Department of Fish and Wildlife (CDFW). Based on the submitted information, the City, acting as the lead agency (and CDFW, if CDFW requests) shall determine whether to allow a narrower buffer.

## GEOLOGY

**GEO-1** The proposed Project shall be designed to accommodate fault rupture where present in accordance with applicable Caltrans guidelines, including MTD 20-8, Analysis of Ordinary Bridges that Cross Faults, dated January 2013; and MTD 20-10, Fault Rupture, dated January 2013, where any portion of a structure falls within an APEFZ, or where any portion of a structure falls within approximately 100 meters (330 feet) of well-mapped active faults, or within 300 meters (1,000 feet) of an un-zoned fault (not in an APEFZ) that is Holocene or younger in age.

Stations and elevated structures for the ATS guideway shall be located to avoid the fault rupture hazard where present with refinement of station and ATS guideway placement worked into final design as needed. Bridge type structures, such as the ATS guideway, shall be designed to take into account potential displacement from a fault offset, dynamic response due to ground shaking, and any other fault-induced hazards (e.g., creep) that may occur. The design shall be in accordance with the Caltrans MTD 20-8, which defines a method for determining the potential displacement at columns and abutments at fault crossings and designing the structure so it can slide without falling.

**GEO-2** Prior to the start of construction, the location of the anticipated trend of the Townsite Fault shall be further defined via a phased investigation process to identify and locate active fault traces to support adjustments to the final design as needed. The phased investigation shall be prepared by registered professionals (i.e., California Professional Civil Engineer, Professional Engineering Geologist with experience in fault evaluations) and include a fault investigation conducted along the trace of the Townsite Fault to refine its location and assess its activity level where it crosses the ATS guideway and stations. The following methods shall be included in the investigation:

- Aerial photograph analysis;
- Geophysical surveys (e.g., seismic reflection and/or seismic refraction) to refine the location of the Townsite fault and inform subsequent targeted fault hazard exploration, as necessary;

- Targeted fault trenching based on the findings of additional geophysical studies to locate the potential Townsite Fault where it crosses the proposed ATS alignment; and
- Exploratory drilling and sampling (e.g., hollow stem auger and cone penetration test borings), as necessary, if the trace of the Townsite fault cannot be adequately delineated across the proposed ATS alignment through the means of fault trenching.

Based on the results of these investigations, column placements and facility designs shall be adjusted to accommodate geologic conditions identified. Further, the facilities shall be designed in accordance with applicable Caltrans guidelines including MTD 20-8, Analysis of Ordinary Bridges that Cross Faults, and MTD 20-10, Fault Rupture. Stations/structures and columns/foundations shall be located to avoid the fault rupture hazard where present. Probabilistic procedures shall follow those outlined in the *Fault Rupture Hazard Evaluation* prepared for the proposed Project. If further study of the fault rupture is conducted, then procedures as outlined in CGS Note 4938 shall be followed.

**GEO-3** The proposed ATS system facilities shall be designed in accordance with applicable Caltrans guidelines including Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults) and 20-10 (Fault Rupture). The response spectra provided in the *Development of Seismic Design Criteria in Support of Draft EIR - Seismic Design Criteria* shall be considered applicable for both aerial guideway and ancillary structures within each segment of the alignment under the guideway and each station. Probabilistic procedures also shall follow those outlined in Caltrans Memo to Designers 20-10-Fault Rupture, dated January 2013.

## HAZARDOUS MATERIALS

**HAZ-1** The following features and actions address potential adverse effects associated with the use, handling and releases of hazardous materials:

- Building Demolition Plan. Prior to any demolition activities, the contractor shall conduct an evaluation of all buildings built prior to 1980 to be demolished to identify the presence of ACMs and LBP. Remediation will be required to be implemented in accordance with the recommendations found in the evaluations and to ensure ACMs and LBP are removed to levels established for public safety.
- Hazardous Materials Contingency Plan. The contractor shall prepare a plan addressing the potential for discovery of undocumented or previously unidentified USTs, hazardous materials, petroleum hydrocarbons, or hazardous or solid wastes encountered during construction. This plan shall address UST decommissioning, field screening and materials testing methods, contaminant management requirements, and health and safety requirements to ensure no exposure to hazards or hazardous materials occurs on site and to ensure any contaminated materials encountered during construction are removed to levels established for public safety
- Soil Management Plan. A Soil Management Plan shall be prepared after final construction plans are prepared showing the lateral and vertical extent of soil excavation and establish soil reuse criteria, define a sampling plan for stockpiled materials, describe the disposition of materials that do not satisfy the reuse criteria, and specify guidelines for imported materials. Disturbed soils will be monitored for visual evidence of contamination (e.g., staining or discoloration). Soil will also be monitored for the presence of VOCs using appropriate field instruments such as organic vapor measurement with photoionization detectors or flame ionization detectors in accordance with South Coast Air Quality Management District Rule 1166. If the monitoring procedures indicate the possible presence of contaminated soil, a contaminated soil contingency plan will be implemented and will include procedures for segregation, sampling, and chemical analysis of soil. Contaminated soil will be profiled for

disposal and will be transported to an appropriate hazardous or non-hazardous waste or recycling facility licensed to accept and treat the type of waste indicated by the profiling process. In addition, a contaminated soil contingency plan will be developed and in place during all construction activities. If these processes generate any contaminated groundwater that must be disposed of outside of the dewatering/National Pollutant Discharge Elimination System process, the groundwater will be profiled, manifested, hauled, and disposed of in the same manner.

- Health and Safety Plan. A Health and Safety Plan shall be developed to address the potential for exposure to the constituents of concern.

## HISTORIC, ARCHAEOLOGICAL, AND PALEONTOLOGICAL RESOURCES

**TCR-1** **Retention of a Tribal Cultural Resources Monitor/Consultant.** Prior to the commencement of any ground disturbing activity at the Project alignment, the project applicant, in consultation with the City, shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (US Department of the Interior, 2008) to carry out all mitigation related to cultural resources. In addition, a Native American Monitor shall be designated by the Gabrieleno Band of Mission Indians-Kizh Nation – the tribe that consulted on this project pursuant to Assembly Bill A52 (the "Tribe" or the "Consulting Tribe"). If no Native American Monitor is designated within a reasonable period of time (not to exceed 30 days), the activity can commence without the designated Monitor. A copy of the executed contract shall be submitted to the City of Inglewood Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Native American monitor will only be present on- site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Native American Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project alignment are completed, or when the Native American Representatives and Native American Monitor have indicated that all upcoming ground- disturbing activities at the Project alignment have little to no potential for impacting Tribal Cultural Resources. Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist and Native American monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project alignment, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project alignment while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). If a non-Native American resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA.

Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of

archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

**TCR-2** **Monitoring and Mitigation Program.** Prepare, design, and implement a Monitoring and Mitigation Program for the proposed Project. The Monitoring and Mitigation Program shall define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance planned for each portion of the Project area, data recovery (including halting or diverting construction so that archaeological remains can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement, and reporting. The Monitoring and Mitigation Program shall be prepared and approved by a qualified archaeologist prior to the issuance of the first grading permit.

**TCR-3** **Cultural Resources Sensitivity Training.** The qualified archaeologist and Native American Monitor shall conduct construction-worker archaeological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and will present the Monitoring and Mitigation Program as outlined in **TCR-2**, for all construction personnel conducting, supervising, or associated with demolition and ground disturbance, including utility work, for the Project. In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. Construction personnel shall be informed of the types of prehistoric and historic archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. Documentation shall be retained by the qualified archaeologist demonstrating that the appropriate construction personnel attended the training.

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

1. In the event of the discovery of any archaeological materials during implementation of the Project, all work shall immediately cease within 50 feet of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has made a determination on the significance of the resource(s) and provided recommendations regarding the handling of the find. If the resource is determined to be significant, the qualified archaeologist will confer with the City and project applicant regarding recommendation for treatment and ultimate disposition of the resource(s).
2. If it is determined that the discovered archaeological resource constitutes a historical resource or a unique archaeological resource pursuant to CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place may be

accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement.

3. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with the City and project applicant, and appropriate Native American representatives (if the find is of Native American origin). The Cultural Resources Treatment Plan shall provide for the adequate recovery of the scientifically consequential information contained in the archaeological resource through laboratory processing and analysis of the artifacts. The Cultural Resources Treatment Plan will further make recommendations for the ultimate curation of any archaeological materials, which shall be curated at a public, non-profit curation facility, university or museum with a research interest in the materials, if such an institution agrees to accept them. If resources are determined to be Native American in origin, they will first be offered to the Tribe for permanent curation, repatriation, or reburial, as directed by the Tribe. If no institution or Tribe accepts the archaeological material, then the material shall be donated to a local school or historical society in the area for educational purposes.
4. If the resource is identified as a Native American, the qualified archaeologist and the City shall consult with appropriate Native American representatives, as identified through the AB 52 consultation process in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered.
5. Prepare a final monitoring and mitigation report for submittal to the City, and the South Central Coastal Information Center (SCCIC), in order to document the results of the archaeological and Native American monitoring. If there are significant discoveries, artifact and feature analysis and final disposition shall be included with the final report, which will be submitted to the SCCIC and the City. The final monitoring report shall be submitted to the City within 90 days of completion of excavation and other ground disturbing activities that require monitoring.

**TCR-5: Inadvertent Discoveries Related to Human Remains.** In the event of the unanticipated discovery of human remains during excavation or other ground disturbance related to the proposed Project, all work shall immediately cease within 150 feet of the discovery and the County Coroner shall be contacted in accordance with PRC Section 5097.9874 and Health and Safety Code Section 7050.5.75 Additionally, the contractor shall notify the City, and the tribal cultural resources monitor and archaeological monitor.

The City, as the Project sponsor, and the contractor shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural and tribal standards or practices, and that further ground-disturbing activities take into account the possibility of multiple burials.

No further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remans (as determined by the qualified archaeologist and/or tribal cultural resources monitor) shall occur until the coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If such a discovery occurs, a temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected (as determined by the qualified archaeologist and/or cultural resources monitor), and consultation and treatment could occur as prescribed by law. As required by law, the coroner would determine within two working days of being notified if the remains are subject to his or her authority.

If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC. In accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by AB 2641), the NAHC would make an MLD determination. If the Tribe is designated MLD, the following standards shall apply and the following requirements and treatment measures shall be implemented.

1. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

2. Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. As stated by the Tribe as part of the Project's AB 52 consultation:

   > *The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully.*

3. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations must either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. Scientific study or the utilization of any invasive diagnostics on human remains of Native American origin.

4. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if feasible. These items shall be retained and reburied within six months of recovery if feasible. The site of reburial/repatriation shall be on the Project area, but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

   If the Tribe is not designated MLD, each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects, and objects of cultural patrimony shall be preserved in place where feasible and to consult with the tribal cultural resources monitor and/or the MLD about appropriate treatment if removal is required. If remains are removed, they shall be removed to a secure container on site if possible, with consultation with of the qualified archaeologist and/or tribal cultural resources monitor. These items shall be retained and reburied within six

months of recovery or as directed by the qualified archaeologist and/or tribal cultural resources monitor. The site of reburial/repatriation shall be within the proposed Project footprint, or at a location agreed upon between the MLD and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

## NOISE AND VIBRATION

**NV-3** A Construction Noise Control Plan shall be developed in coordination with a certified acoustical/vibration consultant and shall be approved by the City's Director of Public Works prior to construction. The Plan shall include measures demonstrating that construction noise levels will be below FTA's General Assessment Construction Noise Criteria. The following construction noise reduction measures shall be incorporated into the Plan:

- Install temporary noise barriers that reduce sound at receptors;
- For any idling that is expected to take longer than five minutes, the engine shall be shut off;
- All equipment shall be equipped with optimal muffler systems;
- Use solar, battery powered, or hybrid equipment whenever practical;
- Locate staging areas as far away from sensitive receptors as feasible;
- Locate stationary noise sources as far away from sensitive receptors as feasible;
- Enclose stationary noise sources, such as diesel-or gasoline-powered generators, with acoustical barriers where necessary and required;
- If stationary equipment cannot be enclosed within a shed or barrier, such equipment must be muffled and located at least 100 feet from sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.
- Pole power shall be utilized to the maximum extent feasible in lieu of generators.
- Impact tools (i.e., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust and external jackets shall be used where feasible to lower noise levels. Quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible. Additionally, use of "quiet" pile driving technology (such as auger displacement installation), where feasible in consideration of geotechnical and structural requirements and conditions shall be considered.
- Coordinate with the Inglewood Unified School District administrators to avoid disruptive noise during school hours.

In order to ensure that construction noise levels will be below the established standards, the following shall be incorporated into the Plan:

- A monitoring plan shall be implemented during demolition and construction activities. Warning thresholds shall be defined that are 5 dBA below the specified noise limits to allow sufficient time for the Contractor to take actions to reduce noise. A monitoring record that documents all alarms and actions taken to comply with these measures shall be provided to the City upon request.

- In the event the warning level (dBA) is exceeded, construction activities shall be temporarily halted in the vicinity of the area where the exceedance occurs. The source of the noise exceeding the warning level shall be identified followed by actions to be implemented to reduce noise levels below the established standards. Noise measurements shall be gathered after actions are taken to verify noise levels are below the warning level before construction activities restart. The following are examples of actions that can be taken to reduce construction noise levels:

    - Halting/staggering concurrent construction activities in certain locations;

- Reducing the speed or intensity of the heavy-duty construction equipment being operated simultaneously;
- Operating equipment at the lowest possible power levels;
- Modifying equipment, such as dampening of metal surfaces or other redesign to minimize metal-to-metal impacts.

**NV-4** Prior to the issuance of any demolition or construction permit for each phase of the proposed Project, a Construction Vibration Reduction Plan shall be prepared to minimize construction vibration at nearby sensitive receptors from vibration created by construction activities. The Plan shall be developed in coordination with a certified acoustical/vibration consultant and shall be approved by the City's Director of Public Works. The Plan shall include but not be limited to the following elements:

- A Pre-Demolition and Construction Plan that includes but is not limited to:
  - Photos of current conditions of buildings and structures that could be damaged from construction activities. This crack survey shall include photos of existing cracks and other material conditions present on or at the surveyed buildings. Images of interior conditions shall be included if possible. Photos in the report shall be labelled in detail and dated.
  - Identify representative cracks in the walls of existing buildings, if any, and install crack gauges on such walls of the buildings to measure changes in existing cracks during proposed Project activities.
  - Crack gauges shall be installed on multiple representative cracks, particularly on sides of the building facing the proposed Project.
  - Determine the number and placement of vibration sensors at the affected buildings in consultation with a qualified architect. The number of units and the locations of these sensors shall take into account proposed demolition and construction activities to ensure that adequate measurements can be taken illustrating vibration levels during the course of the proposed Project, and if/when levels exceed the established threshold.
  - A line and grade pre-construction survey at the affected buildings shall be conducted.
- A Vibration Plan During Demolition and Construction that includes the following:
  - Regularly inspect and photograph crack gauges, maintaining records of these inspections to be included in postconstruction reporting. Gauges shall be inspected every two weeks, or more frequently during periods of active project actions in close proximity to crack monitors.
  - The vibration monitoring system shall measure and continuously store the peak particle velocity (PPV) in inches/second. Vibration data shall be stored on a one-second interval. The system shall also be programmed for two preset velocity levels: a regulatory level that represents when PPV levels would exceed the FTA's threshold of significance for a building given its conditions, and a warning level that is 0.05 inch/second (PPV) less than the regulatory level. The system shall also provide real-time alert when the vibration levels exceed either of the two preset levels.
  - In the event the warning level (PPV) is triggered, the contractor shall identify the source of vibration impacts and establish steps to reduce the vibration levels, including but not limited to halting or staggering concurrent activities and using lower vibratory techniques.
  - In the event the regulatory level (PPV) is triggered, halt the construction activities in the vicinity of the trigger area and visually inspect the building for any damage. Results of

the inspection must be logged. Identify the source of vibration generation and provide steps to reduce the vibration level. Vibration measurement shall be made with the new construction method to verify that the vibration level is below the warning level (PPV). Construction activities may then restart.

- In the event work occurs in the proximity of identified historic uses, the system shall be programmed for two preset velocity levels: a regulatory level that represents when PPV levels would exceed the FTA threshold of significance 0.12 inch/second for a building given its conditions, and a warning level that is 0.012 inch/second (PPV) less than the regulatory level.
- Collect vibration data from receptors and report vibration levels to the City Chief Building Official on a daily basis. The reports shall include annotations regarding project activities as necessary to explain changes in vibration levels.

- Post-Construction Reporting and Repairs:
  - Provide a report to the City Chief Building Official regarding crack and vibration monitoring conducted during demolition and construction. In addition to a narrative summary of the monitoring activities and their findings, this report shall include photographs illustrating the postconstruction state of cracks and material conditions that were presented in the pre-construction assessment report, along with images of other relevant conditions showing the impact, or lack of impact, of project activities. The photographs shall sufficiently illustrate damage, if any, caused by the proposed Project and/or show how the proposed Project did not cause physical damage to the buildings. The report shall include analysis of vibration data related to project activities, as well as summarize efforts undertaken to avoid vibration impacts. Finally, a postconstruction line and grade survey shall also be included in this report.
  - Perform repairs to buildings if damage is caused by vibration or movement during the demolition and/or construction activities. Repairs may be necessary to address, for example, cracks that expanded as a result of the proposed Project, physical damage visible in post-construction assessment, or holes or connection points that were needed for shoring or stabilization. Repairs shall be directly related to project impacts and will not apply to general rehabilitation or restoration activities of the buildings.
- To minimize the risk of potential structural and building damage:
  - Limit the location of pile driving and vibratory roller activity to not be within 55 feet and 30 feet of the nearest off-site sensitive receptor, respectively.
  - Limit the number of jackhammers operating simultaneously to one piece operating within 45 feet of off-site sensitive receptors.
  - In the event impact pile driving is required, equipment shall only be used from the hours of 7:00 AM to 7:00 PM. If feasible, pile driving should use alternative technology such as vibration or hydraulic insertion.
- To minimize the risk of related to human annoyance:
  - Limit the location of pile driving to 310 feet of off-site vibration sensitive receptors.
  - Limit the location of vibratory roller to 150 feet of off-site vibration sensitive receptors.
  - Limit the location of large bulldozer to 85 feet of off-site vibration sensitive receptors.
  - Limit the location of caisson drilling to 85 feet of off-site vibration sensitive receptors.
  - Limit the location of loaded trucks to 75 feet of off-site vibration sensitive receptors.

- Limit the location of jackhammers to 45 feet of off-site vibration sensitive receptors.
- Limit the location of small bulldozer to 25 feet of off-site vibration sensitive receptors.

## SAFETY AND SECURITY

See Avoidance Measure **TRANS-1**.

## UTILITIES

**UT-1** Prior to the award of the DBFOM contract, and start of any demolition or construction activities, the City shall be responsible for identifying the locations of existing utilities potentially affected by the proposed Project. This shall include coordinating with all existing utility providers for wet and dry utilities (water, sewer, gas, electric, and telecommunications) to obtain documentation of existing utility locations. Field verification (i.e., potholing and other methods as appropriate) shall be conducted to document the locations of all utilities within 20 feet of the guideway and station foundations. Based on the information from the field investigations, the DBFOM contractor shall be responsible for coordinating with the appropriate utility owners/operators to determine specific set back requirements for each utility line and the need for any stabilization for protection in place or relocation measures.

**UT-2** Prior to the award of the DBFOM contract, and start of construction, the City shall contact SCE and request an updated system Distribution Study to determine the amount of load that SCE could accommodate and required infrastructure upgrades in order to meet the recommended full redundancy design. Should SCE determine that additional system upgrades are required, such upgrades shall be the responsibility of the DBFOM contractor and/or the City to complete (including design and any additional environmental clearance), subject to the review and approval of SCE and the City, as applicable.

# 9.0 LIST OF PREPARERS

## TERRY A. HAYES ASSOCIATES INC.

Allyson Dong, Senior Planner
Blaire Frei, Associate Planner
Henry Haprov, GIS Specialist

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